UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
11201 Renner Boulevard
Lenexa, Kansas 66219

JUN 6 2016

MEMORANDUM

SUBJECT: SPCC Inspection Report
MFA Oil Company, Warrensburg Bulk Plant & Petro Card
Warrensburg, MO

FROM: Mindy Luetke, On-Scene Coordinator 5/31/2016
ERNB/PPNS

THROUGH: Dave Williams, Chief 6/2/16
ERNB/PPNS

TO: Scott Hayes, Chief
STOP Branch

The MFA Oil Company operates a bulk oil distribution facility at 128 Northwest Highway 50, Warrensburg, Missouri. The facility was randomly selected for an SPCC inspection as part of the on-the-job-training requirements for new oil inspectors.

The facility consists of 7 aboveground storage tanks (ASTs) and approximately 22 drums, with a total storage capacity in excess of 72,210 gallons. The facility also has a loading rack. The facility is manned approximately 8 hours each weekday. In additional to oil storage, the company keeps an inventory of empty ASTs on site for their customers. These tanks have no connected piping, but are not labeled as empty per SPCC requirements. The containment volume for empty tanks stored on site is undetermined and not considered in the 72,210 containment capacity of the facility.

Sized, specific-secondary containment for the ASTs is provided via poured concrete containment dikes. However, the SPCC Plan does not address general secondary containment for undiked areas with a potential for a release (i.e., the dispenser pumps and aboveground piping outside containment). During the inspection, facility personnel indicated that absorbent materials were available in the warehouse with emergency response numbers and emergency shutoff switch located near the undiked areas. While these provisions satisfy the requirement, they need to be discussed in detail in the SPCC Plan as they specifically relate to the general secondary containment requirement. Additionally, drums in the warehouse are stored within secondary containment; however the SPCC Plan does not address containment for the drums.

The SPCC Plan for the facility lacks details regarding the integrity testing program. The Plan mentions the need for periodic tank integrity testing, but does not include any details regarding the testing or schedule. Documentation was available during the inspection to show that some integrity testing has been conducted; however, the inspection forms are unsigned, undated, and do not meet the requirements of the referenced industry standards.

Additionally, spill reporting procedures required by 40 CFR 112.7 (a)(4) are not well defined. The SPCC Plan does not address pertinent information to provide when spill notifications are made to the National Response Center.

Records of high level alarm testing were not available at the time of the inspection.

General housekeeping appeared good and there was no evidence of unaddressed spills or releases at the facility. The completed SPCC Inspection Checklist and supporting documentation are attached for your review.

If you have any questions, feel free to contact me at x7961.

Attachments.

Attachment 1

Spill Prevention, Control, and Countermeasure (SPCC) Plan for MFA Warrensburg Bulk Plant & Petro Card Warrensburg, MO

ENVIRONMENTAL WORKS
OUR EXPERTISE. YOUR SUCCESS.

SPILL PREVENTION CONTROL & COUNTERMEASURE (SPCC) PLAN

MFA Oil Bulk Plant (BP) & Petro Card (PC)
128 Northwest Highway 50
Warrensburg, Johnson County, Missouri

November 2011

Revised November 3, 2015

Prepared for:

MFA Oil Company
One Ray Young Drive
P.O. Box 519
Columbia, MO 65205-0519

In Accordance With 40 CFR Part 112

Corporate Headquarters
1455 E. Chestnut Expy
Springfield, MO 65802
P: 417.890.9500
F: 417.823.9659

201 Main Street, Suite 200
Kansas City, MO 64105
P: 816.285.8410
F: 816.285.8409

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Joplin, MO 64801
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St. Louis, MO

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www.environmentalworks.com

TABLE OF CONTENTS

Section **Page**

Table of Contents i
SPCC Plan Requirements Summary iii
Distribution List iv
Engineer Certification v
Emergency Notification Phone List vi
Applicability of Substantial Harm Criteria vii
SPCC Plan Review viii
How to Use This Plan ix

1.0 SPCC PLAN REGULATORY INFORMATION 1-1
1.1 PLAN AVAILABILITY 1-1

2.0 GENERAL SPCC REQUIREMENTS [40 CFR 112.7] 2-1
2.1 MISC. REQUIREMENTS [40 CFR 112.7 (a)] 2-1
2.1.1 Facility Physical Layout [40 CFR 112.7(a)(3)] 2-1
(a)Type of Oil and Capacity 2-1
(b)Discharge Prevention Measures 2-1
(c)Discharge/Drainage Controls 2-2
(d)Countermeasures 2-6
(e)Methods of Disposal 2-6
(f)Contact List 2-7
2.1.2 Discharge Reporting/Procedures [40 CFR 112.7(a)(4) & (5)] 2-7
2.2 POTENTIAL DISCHARGES [40 CFR 112.7(b)] 2-7
2.3 CONTAINMENT AND DIVERSIONARY STRUCTURES [40 CFR 112.7(c)] 2-7
2.4 CONTAINMENT AND DIVERSIONARY STRUCTURES IMPRACTABILITY [40CFR 112.7(d)] 2-7
2.5 INSPECTIONS, TESTS, RECORDS [40 CFR 112.7(e)] 2-9
2.6 PERSONNEL, TRAINING AND DISCHARGE PREVENTION PROCEDURES [40 CFR 112.7(f)] 2-9
2.7 SECURITY [40 CFR 112.7(g)] 2-9
2.8 FACILITY TANK TRUCK LOADING/UNLOADING PROCEDURES [40 CFR 112.7(h)] 2-10
2.9 BRITTLE FACTURE [40 CFR 112.7(i)] 2-11
2.10 CONFORMANCE WITH APPLICABLE REQUIREMENTS [40 CFR 112.7(j)] 2-11

Engineer's Seal

November 10, 2011
Date

Duane Ottmar
Name of Professional Engineer

3.0 REQUIREMENTS FOR ONSHORE FACILITIES [40 CFR 112.8] 3-1
3.1 FACILITY DRAINAGE [40 CFR 112.8(b)] 3-1
3.2 BULK STORAGE CONTAINERS [40 CFR 112.8(c)] 3-1
3.2.1 Storage Container Construction and Materials 3-1
3.2.2 Secondary Containment 3-1
3.2.3 Drainage of Storm Water 3-2
3.2.4 Buried Storage Tanks 3-2
3.2.5 Partially Buried Storage Tanks 3-2
3.2.6 Aboveground Container Integrity Testing and Inspection 3-3
3.2.7 Heating Coils 3-3
3.2.8 Alarm Systems 3-3
3.2.9 Treatment Facilities 3-3
3.2.10 Visible Oil Leaks 3-3
3.2.11 Mobile or Portable Containers 3-3
3.3 FACILITY TRANSFER OPERATIONS, PUMPING, AND IN-PLANT PROCESS [40 CFR 112.8(d)] 3-4

LIST OF FIGURES

Figure Number	Title	Page
Figure 1.0	Site Location	2-3
Figure 2.0	Facility Diagram	2-4
Figure 3.0	Aboveground Storage Tank Layout	2-5

LIST OF TABLES

Table Number	Title	Page
Table 2-1	Petroleum Aboveground Storage Containers	2-6
Table 2-2	Potential Discharges	2-8

LIST OF APPENDICES

Appendix Letter	Title
A	Discharge Preventive Measures
B	Oil Spill Contingency Plan
C	Aboveground Storage Tank Inspection Forms
D	Employee Training and Briefing Attendance Records
E	Secondary Containment Calculations
F	Secondary Containment/Diked Area Drainage Inspection Form
G	Reporting Procedures
H	5-Year Review & Evaluation
I	Stormwater Pollution Prevention Plan, Written By MFA Oil, Inc.

November 10, 2011
Date

Duane Ottmar
Name of Professional Engineer

Engineer's Seal

SPCC PLAN REQUIREMENTS SUMMARY
MFA Warrensburg BP & PC

The facility SPCC Plan requires the following:

- *Utilization of Spill Prevention Practices (Discharge Preventive Measures see Appendix A)*
- *Proactive Response to a Spill Incident (Oil Spill Contingency Plan see Appendix B)*
- *Aboveground Storage Tank (AST) Inspections*
- *Secondary Containment Drainage Inspection (each rain event)*
- *Annual Employee Training*
- *Review and evaluation of SPCC Plan (at least once per five years)*
- *Re-certification of SPCC Plan by Professional Engineer (after SPCC Plan technical amendment)*

SPCC Plan Modification - All modifications should be recorded on page viii. Minor modifications to the SPCC Plan (Plan) such as telephone number changes, emergency contact personnel changes, etc., can be made without requiring re-certification from a professional engineer. The SPCC Plan should always be modified (within 6 months):

- *When there is a change in facility design, construction, operation, or maintenance, which materially affects the facility's potential for the discharge of oil.*

- *After SPCC Plan review, if more effective prevention and control technology has been field-proven at the time of review and will significantly reduce the likelihood of an oil discharge.*

MFA may also need to modify the SPCC Plan, and will need to notify the EPA and submit your SPCC to the EPA, when:

- *The facility has discharged more than a 1,000 gallons of oil, in a single discharge, into or upon the navigable waters of the United States or adjoining shoreline or into the waters of the contiguous zone, or in connection with activities under the Outer Continental Shelf Lands Act or the Deepwater Port Act of 1974, or that may affect natural resources belonging to, appertaining to, or under the exclusive management authority of the United States (including resources under the Magnuson Fishery Conservation and Management Act).*

- *The facility has discharged more than 42 U.S. gallons of oil in each of two discharges (as described above) occurring within any 12-month period.*

Recordkeeping – Blank forms of the following records are included in the appropriate appendices of this SPCC Plan. Completed forms should be maintained in the official copy of the SPCC Plan in the appropriate appendix for at least 3 years.

- *AST Inspections (found in Appendix C)*
- *Annual Employee Training Logs (found in Appendix D)*
- *Secondary Containment Drainage Inspections (found in Appendix F)*
- *5-Year Review and Evaluation Forms (found in Appendix H)*

SPCC PLAN DISTRIBUTION LIST
MFA Warrensburg BP & PC

This page is designed to list all personnel that have a copy of this Plan. MFA Oil Company must authorize any additions or corrections to this list.

Name	Title	Number of Copies	Copy Type
Carla Mathes	Manager	1	Official Facility Copy
Tracy Barth	MFA Environmental, Health and Safety (EH&S) Director	1	Official Headquarters Copy

Review & Amendment of Spill Prevention, Control, and Countermeasure Plan

MFA Oil Co. Location	**Warrensburg BP/PC**		
Street Address	**128 Northwest 50 Hwy.**		
City	**Warrensburg**	**State**	**MO**
Review Date	**11/03/2015**		

☒ I have completed review and evaluation of the SPCC Plan for the facility named above on the date listed above, and **will not amend** the Plan as a result.

☐ I have completed review and evaluation of the SPCC Plan for the facility named above on the date listed above, **and will amend the Plan** as a result.

Reviewer Signature:

Signature

11/03/2015

Date

Daniel Creek

Name

EHS Coordinator

Title

ENGINEER CERTIFICATION

Name of Facility: MFA Warrensburg

Type of Facility: Bulk Petroleum Plant & Petro Card

Location of Facility: 128 Northwest Highway 50
Warrensburg, MO 64093

Name and Address of Operator: MFA Oil Company
One Ray Young Drive
P.O. Box 519
Columbia, MO 65205-0519

Designated Person Responsible for Oil Spill Prevention: Carla Mathes, Manager

Management Approval

Full approval is extended by management at a level with authority to commit the necessary resources for implementation of the SPCC Plan.

Signature	**Date** 11/6/15
Name	**Title** EHS Coordinator

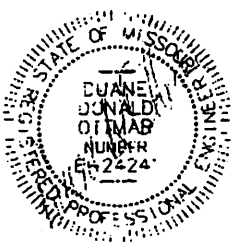
Certification

I hereby certify that this facility has either been examined by me or by individuals under my supervision, and being familiar with the provisions of 40 CFR, Part 112, I attest that this SPCC Plan has been prepared in accordance with good engineering practices (including consideration of applicable industry standards and with the requirements of Part 112), and the SPCC Plan is adequate for this facility. Furthermore, I certify that procedures for required inspections and testing have been established.

Engineer's Seal

November 10, 2011
Date

Duane Ottmar
Name of Professional Engineer



ENGINEER CERTIFICATION

Name of Facility: MFA Warrensburg

Type of Facility: Bulk Petroleum Plant & Petro Card

Location of Facility: 128 Northwest Highway 50
Warrensburg, MO 64093

Name and Address of Operator: MFA Oil Company
One Ray Young Drive
P.O. Box 519
Columbia, MO 65205-0519

Designated Person Responsible for Oil Spill Prevention: Larry Eggen, Manager

Management Approval

Full approval is extended by management at a level with authority to commit the necessary resources for implementation of the SPCC Plan.

Signature	**Date** 11/9/11
Name	**Title**

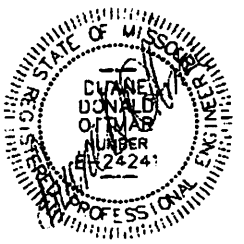
Certification

I hereby certify that this facility has either been examined by me or by individuals under my supervision, and being familiar with the provisions of 40 CFR, Part 112, I attest that this SPCC Plan has been prepared in accordance with good engineering practices (including consideration of applicable industry standards and with the requirements of Part 112), and the SPCC Plan is adequate for this facility. Furthermore, I certify that procedures for required inspections and testing have been established.

Engineer's Seal

November 10, 2011
Date

Duane Ottmar
Name of Professional Engineer



EMERGENCY NOTIFICATION PHONE LIST

CONTACT LIST	RESPONSIBLE ROLE	PHONE NUMBER
CONTACTS		
Carla Mathes, Manager Tracy Barth, MFA Director, EH&S Also see Appendices B and G	Notification of response agencies; spill reporting	(660) 747-8895 office (816) 258-3199 cell (573) 999-2489 cell (573) 442-6455 home (573) 876-0381 office
GOVERNMENTAL CONTACTS		
National Response Center	Incident reporting (if required)	1 (800) 424-8802
Federal On-Scene Coordinator (EPA Region VII)	Incident reporting; Spill response assistance	(913) 281-0991 or (913) 551-7000
State Emergency Response Commission (SERC)	Incident reporting	1 (800) 780-1014
Missouri Department of Natural Resources	Incident reporting; Spill response assistance	(573) 634-2436
Fire Department / Police Department	Traffic and crowd control; Evacuation assistance	911
EMERGENCY RESPONSE CONTRACTORS:		
Environmental Works	Spill response and clean up resources	(417) 890-9500 (office) (877) 827-9500 (24-hour)
OTHER CONTACTS		
National Weather Service (Pleasant Hill, MO)	Weather reports	(816) 540-6021
Local Radio KTBG 90.9 FM - Warrensburg KWKJ 98.5 FM - Windsor	Public information	 1(866) 909-2743 (660) 747-9191
Missouri One-Call	Utility location	1(800) 344-7483
Western Missouri Medical Center 403 W. Burkarth Road Warrensburg, MO	Medical assistance	(660) 747-2500

A copy of this Emergency Telephone List is included in Appendix B. This list should be copied and posted near each telephone location.

APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA CHECKLIST CERTIFICATION

Facility Name: MFA Warrensburg Bulk Plant & Petro Card

Facility Address: 128 Northwest Highway 50, Warrensburg, Missouri

Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

____ Yes _x_ No

1. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any above ground oil storage tank area?

   ____ Yes _x_ No

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?

   ____ Yes _x_ No

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge from the facility would shut down a public drinking water intake?

   ____ Yes _x_ No

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last five years?

   ____ Yes _x_ No

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Signature _____ **Date** _____

Name _____ **Title** _____

SPCC PLAN REVIEW
MFA Warrensburg BP & PC

This page is designed to track the major and minor changes to the facility SPCC. Any major changes that would affect the secondary containment capacity should be made by a Professional Engineer. Minor changes can be either included on this page or by replacement of the applicable pages within the Plan, and can be completed by the designated person responsible for spill prevention. A formal review of this plan is required every five years (see Appendix H).

Date Amended	Personnel Making Changes	Pages Replaced	Summary of Changes
11/03/15	Dan Creek	iv, v, vi, 2-1, Fig 3.0, 2-6, 2-8 App. B, & App. C.	5-year review of plan
2021			5-year review of plan
2026			5-year review of plan

HOW TO USE THIS PLAN

This SPCC Plan (Plan) is a regulatory requirement that is to be used as a tool to prevent spills and environmental degradation. It is recommended that this Plan be studied in detail until all involved are familiar with common risks that can be remedied and until all staff members know the proper procedures that are to be followed in the event of a spill. The importance of this familiarization and preparation ***prior*** to a spill is difficult to overstate. Forms that can be used to implement the recommendations and requirements of this Plan are provided in the appendices. It is also recommended that the documents in the appendices be copied, completed, and kept with this Plan. Any questions concerning implementation of this Plan should be referred to your local SPCC Coordinator or to Environmental Works, Inc.

It is important to note that any reference to a "bulk storage container" in this Plan is a reference to any container that is used to store oil. Exceptions in the Rule are made for electric transformers, operating equipment reservoirs, and manufacturing equipment reservoirs.

1.0 SPCC PLAN REGULATORY INFORMATION

Title 40 of the Code of Federal Regulations Section 112 (40 CFR Section 112) entitled "Protection of Environment, Oil Pollution Prevention" establishes a requirement of a SPCC Plan to be prepared by any facility which could

> "reasonably be expected to discharge oil in quantities that may be harmful, as described in 40 CFR 110, into or upon the navigable waters of the United States or adjoining shorelines, or into or upon the waters of the contiguous zone, or in connection with activities under the Outer Continental Shelf Lands Act or the Deepwater Port Act of 1974, or that may affect natural resources belonging to, appertaining to, or under the exclusive management authority of the United States (including resources under the Magnuson Fishery Conservation and Management Act)."

Facilities subject to this rule are further defined as those with total capacity of more than 42,000 gallons of underground storage (provided the underground storage is not subject to all the technical requirements of part 280) or more than 1,320 gallons of aboveground storage (counting only 55-gallon containers and above), which, due to their location, could reasonably be expected to discharge oil as described above.

This plan describes the facilities, equipment, and administrative procedures in place to:

- Prevent the occurrence of accidental oil product spills or discharges;
- Minimize any release of petroleum products;
- Inhibit, control, and otherwise prevent the migration of an oil product spill onto navigable waters of the state; and
- Recover product and clean up an oil product spill or accidental discharge.

Procedures, equipment, and facility designs described in the SPCC Plan must meet good engineering practices. For those facilities subject to 40 CFR Section 112, the oversight of a professional engineer ensures that these criteria are met.

1.1 PLAN AVAILABILITY

As required by 40 CFR 112.3(e) a complete copy of this Plan is to be maintained in the office of the Warrensburg Bulk Plant & Petro Card facility. The Plan is to be made available to the United States Environmental Protection Agency (U.S. EPA), Missouri Department of Natural Resources (MDNR), or other regulatory agency personnel for on-site review anytime during normal working hours.

2.0 GENERAL SPCC PLAN REQUIREMENTS [40 CFR 112.7]

2.1 MISC. REQUIREMENTS [40 CFR 112.7(a)]

The following sections detail the requirements for a SPCC plan.

2.1.1 Facility Physical Layout [40 CFR 112.7(a)(3)]

The MFA Warrensburg Bulk Plant & Petro Card is a wholesale distributor and retail merchant of petroleum products located on 128 Northwest Highway 50 (Figure 1.0). Petroleum products are stored within aboveground storage tanks (ASTs) located south of Highway 50, southwest of the office. The contents and capacities of these tanks is as follows:

- 12,000-gallon Unleaded Gasoline AST;
- 12,000-gallon #Unleaded Plus AST;
- 15,000-gallon #2 Red Diesel AST;
- 15,000-gallon #2 Red Diesel AST;
- 15,000-gallon #2 Clear Diesel AST;
- 1,000-gallon B-99 AST (seasonal); and,
- 1,000-gallon B-99 AST (seasonal).

The facility diagram is included as Figure 2.0. The location and contents of each oil storage container (greater than 55-gallons), fuel piping and oil transfer stations are included as Figure 3.0.

(a) Type of Oil and Capacity [40 CFR 112.7(a)(3)(i)]

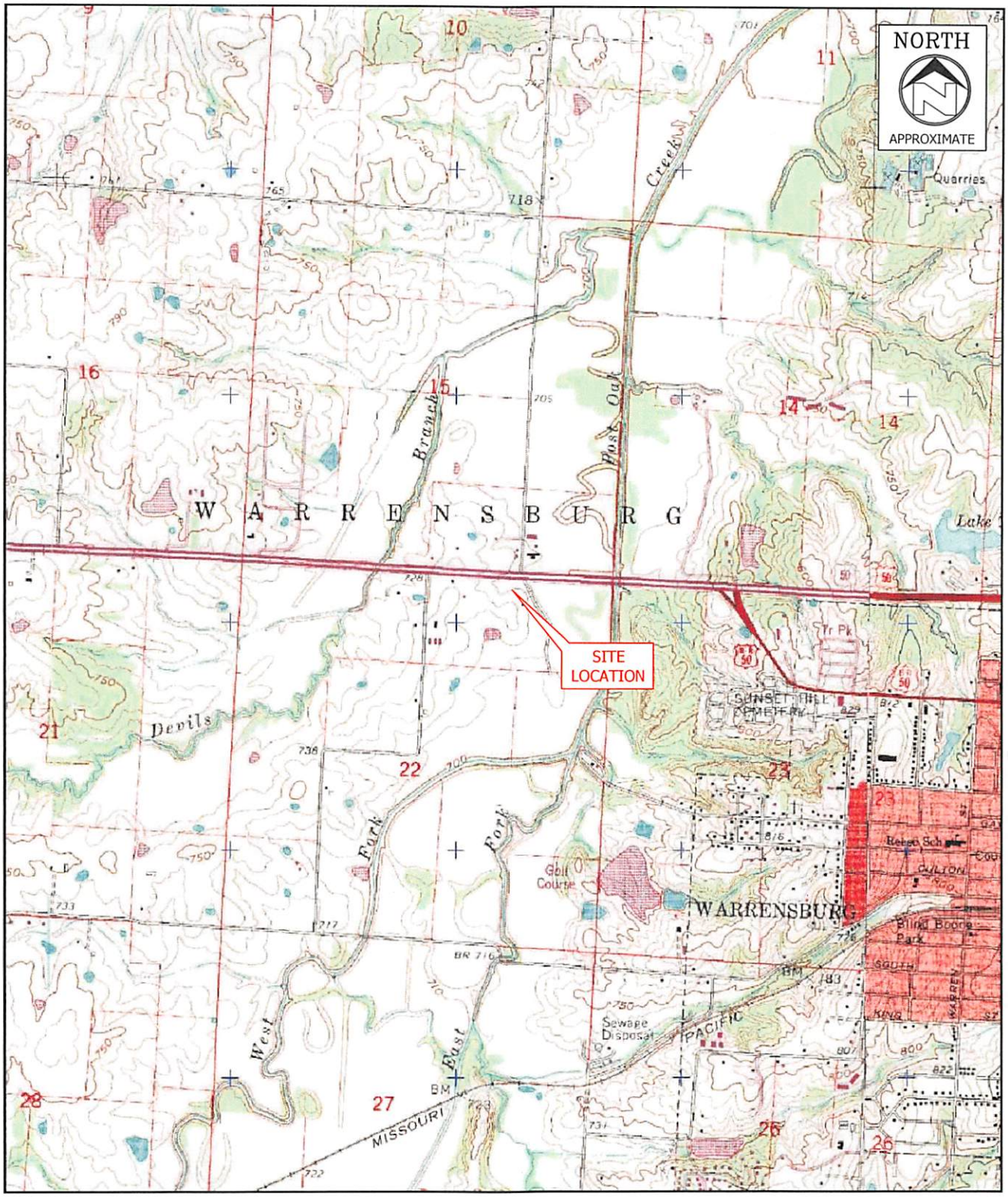
The type of oil stored in each onsite container (55-gallons or greater) and its storage capacity is provided in Table 2-1. Bulk storage containers are further described in Section 3.2.

(b) Discharge Prevention Measures [40 CFR 112.7(a)(3)(ii)]

The discharge preventive measures for the facility including procedures for routine handling of products for the facility are included in Appendix A.

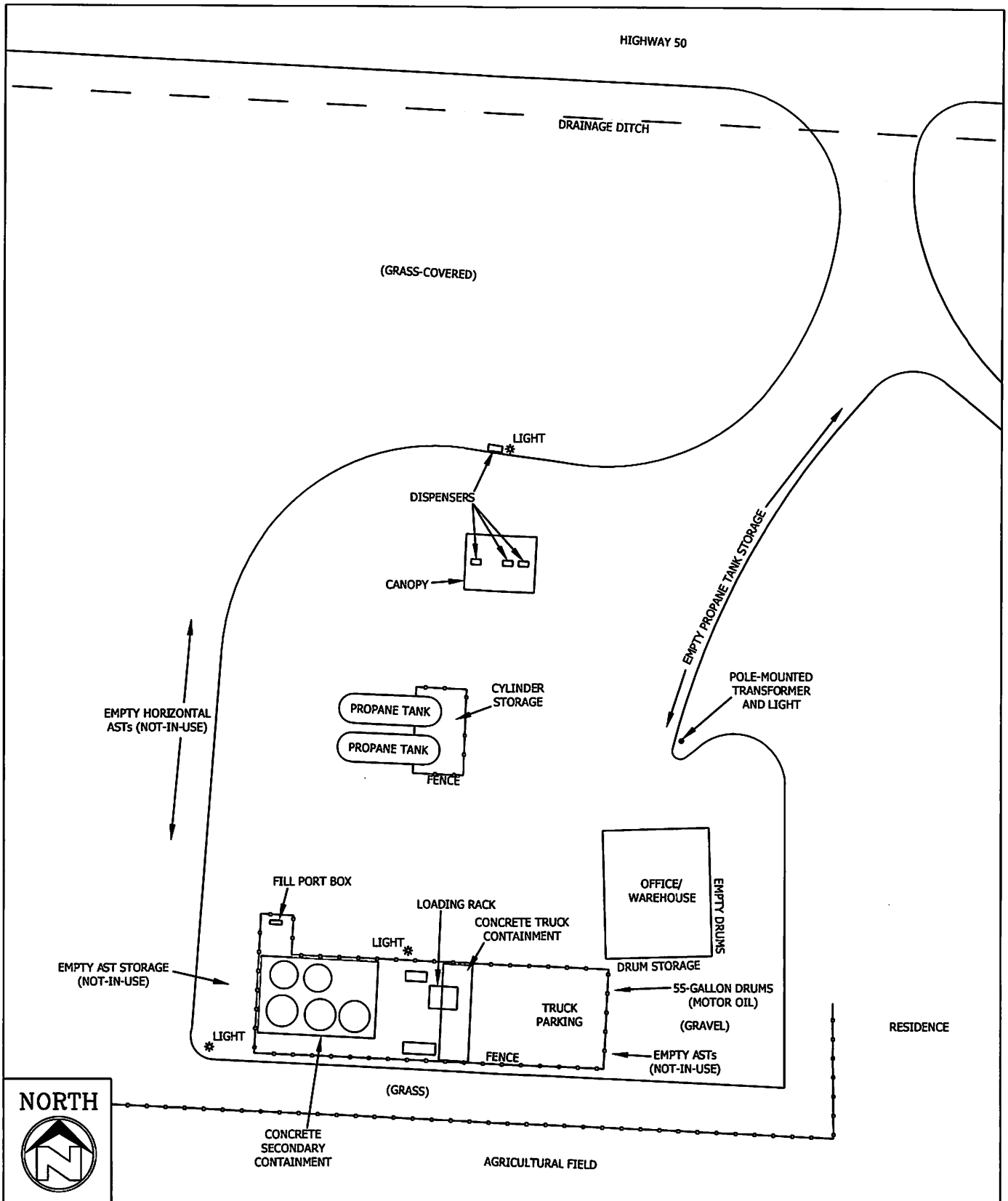
(c) Discharge/Drainage Controls [40 CFR 112.7(a)(3)(iii)]

The discharge/drainage controls for the storage containers is listed in Table 2-1 and discussed in Section 3.2.3. The facility drainage controls are discussed in Section 3.1.

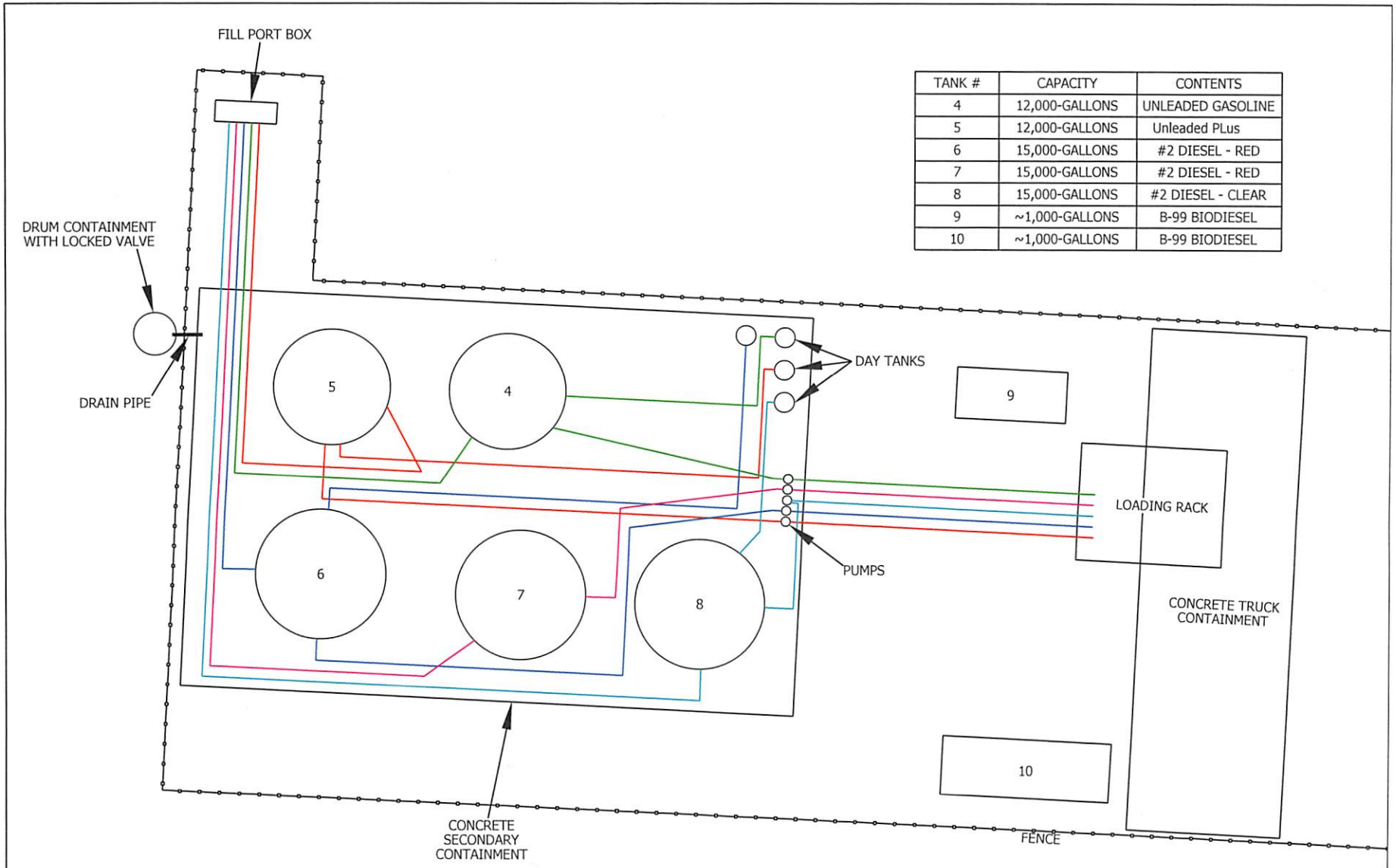


SOURCE: www.mapcard.com

CHECKED BY: H. CAPTAIN	SCALE (FEET) 0 1000 2000 APPROXIMATE	ENVIRONMENTAL WORKS 1455 E. Chestnut Expressway, Springfield, MO 65802	SITE LOCATION-TOPOGRAPHIC MAP	FIGURE 1.0
EWI# 110004 DRAWN BY: MEK Nov. 7, 2011			MFA BULK PLANT AND PETRO CARD 128 N.W. HIGHWAY 50 WARRENSBURG, JOHNSON COUNTY, MISSOURI	



CHECKED BY: H. CAPTAIN E.W.I. # 110004 DRAWN BY: MEK Nov. 7, 2011	SCALE IN FEET 0 25 50 APPROXIMATE	ENVIRONMENTAL WORKS 1455 E. Chestnut Expressway, Springfield, MO 65802	SITE DIAGRAM MFA BULK PLANT AND PETRO CARD 128 N.W. HIGHWAY 50 WARRENSBURG, JOHNSON COUNTY, MISSOURI	FIGURE 2.0



TANK #	CAPACITY	CONTENTS
4	12,000-GALLONS	UNLEADED GASOLINE
5	12,000-GALLONS	Unleaded PLus
6	15,000-GALLONS	#2 DIESEL - RED
7	15,000-GALLONS	#2 DIESEL - RED
8	15,000-GALLONS	#2 DIESEL - CLEAR
9	~1,000-GALLONS	B-99 BIODIESEL
10	~1,000-GALLONS	B-99 BIODIESEL

NORTH

CHECKED BY: H. CAPTAIN

E.W.I. # 110004
DRAWN BY: MEK
Nov. 7, 2011

SCALE IN FEET
0 5 10
APPROXIMATE

ENVIRONMENTAL WORKS

Springfield Office Location:
1455 E. Chestnut Expressway
Springfield, MO 65802
Phone: (417) 890-9500

AST DETAIL DIAGRAM

MFA BULK PLANT AND PETRO CARD
128 NW HIGHWAY 50
WARRENSBURG, JOHNSON COUNTY, MISSOURI

FIGURE
3.0

Table 2-1
Petroleum Aboveground Storage Containers

Container	Maximum Capacity (gallons)	Substance Stored	Type of Tank	Adequate Diking/ Containment	Loading/ Unloading Area Containment
Tank 4	12,000	Unleaded Gasoline	WS	Yes	Yes
Tank 5	12,000	Unleaded Plus	WS	Yes	Yes
Tank 6	15,000	#2 Red Diesel	WS	Yes	Yes
Tank 7	15,000	#2 Red Diesel	WS	Yes	Yes
Tank 8	15,000	#2 Clear Diesel	WS	Yes	Yes
First B-99 Tank	1,000	B-99 (seasonal)	WS	Yes	Yes
Second B-99 Tank	1,000	B-99 (seasonal)	WS	Yes	Yes
Portable Tanks	2,000	Empty	WS	None needed	NA
Drums[1]	55	Used absorbents or New lubricants	WS	None needed or Yes	NA
Tank trucks[2]	2,800	Varies	WS	None needed	Yes

WS – Welded Steel
NA – Not Applicable, via the settlement agreement of *American Petroleum Institute v. Leavitt* et. al., No.1;102CV02247 PLF and consolidated cases.
[1] – 55-gallon drums at the facility routinely hold used absorbents and used Oil Dri, but no liquid. New product drums are stored within the warehouse.
[2] – When the tank trucks are parked and not in use at the facility, they are emptied. Otherwise the trucks are transporting product to various clients in the region.

(d) Countermeasures [40 CFR 112.7(a)(3)(iv)]

The countermeasures for discharge discovery, response, and cleanup are included in Appendices A and B.

(e) Methods of Disposal [40 CFR 112.7(a)(3)(v)]

Disposal methods typically utilized at the facility include those listed below. Other disposal methods may be utilized depending on the actual release conditions.

- Recovered oil and fuel will be handled and disposed or recycled by MFA Oil, Inc.
- Oil-impacted soil, spent absorbents, and response personal protective equipment is either placed into a 55-gallon drum for future disposal or stockpiled onto and covered with plastic or placed directly into dump trucks for disposal at an appropriate landfill.

(f) Contact List [40 CFR 112.7(a)(3)(vi)]

The contact list and telephone numbers for those individuals / agencies who must be contacted in case of a discharge are provided on page vi and in Appendix B.

2.1.2 Discharge Reporting/Procedures [40 CFR 112.7(a)(4) & (5)]

Any employee who observes a release should immediately report it to the Warrensburg Bulk Plant Manager or the Director, EH&S at MFA Oil, Inc. The Director of EH&S must then immediately notify the spill/release information to the MDNR Emergency Response Unit. The reporting phone numbers can be found on the emergency contact list located on page vi and Appendix G. See the Oil Spill Contingency Plan in Appendix B for detailed information.

2.2 POTENTIAL DISCHARGES [40 CFR 112.7(b)]

In order to determine appropriate measures to prevent a discharge, an evaluation was made to identify discharge causes, direction of discharge flow, and discharge flow rate. Each source is listed in Table 2-2. The discharge rate from a failed tank or piping would vary depending on the size and location of the leak and the amount of product in the AST.

2.3 CONTAINMENT AND DIVERSIONARY STRUCTURES [40 CFR 112.7(c)]

The secondary containment and diversionary structures for bulk storage containers are described in Section 3.2.2.

2.4 CONTAINMENT AND DIVERSIONARY STRUCTURE IMPRACTICABILITY [40 CFR 112.7(d)]

All of the ASTs at this facility are listed in Table 2-1. All ASTs are provided with a secondary containment as indicated in Table 2-1. Impracticability does not need to be addressed.

As an additional aid to prevent and contain spills, a strong oil contingency plan following the provision of 40 CFR part 109 has been developed, and is included as Appendix B.

In the event of an oil spill, the convenience store is to commit the manpower, equipment and materials required to remove any harmful quantity of oil discharged.

Table 2-2 - Potential Spills
MFA Warrensburg BP & PC

Source	Type of Failure	Maximum Volume Discharged (gallons)	Rate (GPM)	Direction of flow
Tank 4; Unleaded Gasoline AST	Rupture; Leak	12,000	Varies	Inside secondary containment
Tank 4; Unleaded Gasoline AST	Overfill	700	60-90	Inside secondary containment
Tank 5: Unleaded Plus	Rupture; Leak	12,000	Varies	Inside secondary containment
Tank 5: Unleaded Plus	Overfill	700	60-90	Inside secondary containment
Tank 6: #2 Red Diesel AST	Rupture; Leak	15,000	Varies	Inside secondary containment
Tank 6: #2 Red Diesel AST	Overfill	700	60-90	Inside secondary containment
Tank 7: #2 Red Diesel AST	Rupture; Leak	15,000	Varies	Inside secondary containment
Tank 7: #2 Red Diesel AST	Overfill	700	60-90	Inside secondary containment
Tank 8: #2 Clear Diesel AST	Rupture; Leak	15,000	Varies	Inside secondary containment
Tank 8: #2 Clear Diesel AST	Overfill	700	60-90	Inside secondary containment
Tank 9: B-99 AST	Rupture; Leak	1,000	Varies	Inside secondary containment
Tank 9: B-99 AST	Overfill	700	60-90	Inside secondary containment
Tank 10: B-99 AST	Rupture; Leak	1,000	Varies	Inside secondary containment
Tank 10: B-99 AST	Overfill	700	60-90	Inside secondary containment
Tanker Trucks Delivery to ASTs	Leak	700	Varies	To concrete gutter system which leads to secondary containment
MFA Delivery Trucks	Leak	700	Varies	To concrete gutter system which leads to secondary containment
MFA Delivery Trucks	Overfill	700	60-90	To concrete gutter system which leads to secondary containment
Aboveground Product Piping	Rupture; Leak	Varies	Varies	Inside secondary containment
Underground Product Piping	Rupture; Leak	Varies	Varies	Underground to the northeast
Portable Tanks and 55-gallon drums	None, some drums in the warehouse contain new lubricants	NA	NA	The 55-gallon drums do not contain liquid product, but contain used absorbents and used Oil Dri material or contain new lubricants for retail sale and are stored within the warehouse. The portable tanks do not contain fuel while located at the facility.

2.5 INSPECTIONS, TESTS, AND RECORDS [40 CFR 112.7(e)]

Aboveground storage containers, associated piping, and secondary containment systems are to be inspected in accordance with the inspection procedures and forms provided in Appendix C. The Plant Manager is responsible for ensuring these inspections are performed as required and all items requiring corrective actions are responded to. Completed inspection forms are to be signed by the inspector and maintained with the official copy of this Plan for at least three years. Additional information regarding inspections and tests is provided in Section 3.2.6.

2.6 PERSONNEL, TRAINING AND DISCHARGE PREVENTION PROCEDURES [40 CFR 112.7(f)]

For this facility, the Plant Manager is responsible for providing the proper spill prevention instruction to all personnel involved in fuel/oil handling and/or equipment maintenance.

Training for personnel is to be conducted at least annually to assure adequate understanding of this Plan for this facility. This training is to highlight all applicable pollution control laws, rules and regulations, discharge clean-up procedures, and Best Management Practices (BMPs) to prevent discharges of oil. The training is to also include descriptions of any known discharge events or failures, malfunctioning components, and recently developed precautionary measures.

Completed documentation of employee training and briefing should be kept with the official copy of this plan in Appendix D.

2.7 SECURITY [40 CFR 112.7(g)]

The facility is equipped with the following safety measures and deterrents that can prevent a spill:

- When in non-operating or non-standby service, valves that permit direct outward flow from an oil storage container to the surface are to be kept securely locked in a closed position. This can be accomplished by incorporating any of the following methods:
    - Adding locks directly to padlock wings of the valve,
    - Adding locks to hasps, chains, or comparable hardware to the valve operating stem (or operating handle),
    - Closing adjacent valves and adding chains and locks to the operating wheels of these valves in such a manner that attempting top open either valve will cause the adjacent valve to rotate in the "close" direction. This technique will prevent the valve from being opened until the lock is removed.

- Locking a sleeve or cover placed over the valve operates so the valve can't be opened or closed until the sleeve or cover is removed.

- Starter controls on all pumps are to be locked in the "off" position when they are in non-operating status. Only authorized personnel is to be allowed access to these controls. It may be possible to lock out the pump controls at one or more of the following locations:
  - The main electric control room of the facility,
  - The pump motor control panel, and
  - The disconnect switch near the pumps.

- Loading/unloading connections of oil pipelines and facility piping are to be kept securely capped or blank-flanged when not in service or in standby service for an extended period of time.
  - This may be accomplished by installing a valve at the end of a piping connection and enclosing the valve in a lockable spill box. Said Spill Box shall be so designed that the valve cannot be operated until the box is unlocked and opened.

- The facility appears to be sufficiently illuminated so discharges or acts of vandalism can be discovered during hours of darkness. Existing lighting equipment is to be maintained and kept operational.

- By Rule, this facility is to be protected by deterrents, such as security fencing, that will discourage acts of vandalism. Fencing has been placed around the aboveground tanks and the loading/unloading rack.

- The facility has a security plan, written in accordance with 49 CFR 172. These U.S. Department of Transportation regulations pertain to the security requirements for offerors and transporters of hazardous materials.

2.8 FACILITY TANK TRUCK LOADING/UNLOADING PROCEDURES [40 CFR 112.7(h)]

i) Tank truck unloading procedures shall conform to all requirements established by the Department of Transportation.

ii) Tank truck unloading activities are performed at the north side of the secondary containment at the fill port box.

iii) For tank truck loading activities, the tanker trucks drive onto a large concrete gutter-like pad. This concrete "gutter" will allow any overfill, leak or rupture to enter the secondary containment; thus the loading rack does have secondary containment.

iv) An interlocked warning light, physical barrier system, wheel chocks, or warning signs, or vehicle break interlock system is to be provided and used in loading/unloading areas to prevent vehicular departure before a complete disconnect of the flexible or fixed transfer lines has been made.

v) Prior to filling and departure of any tank truck, the lower-most drain and all outlets of such vehicles shall be closely examined for leakage and if necessary, tightened, adjusted, or replaced to prevent liquid leakage while in transit.

vi) When tank trucks are not in use, they are emptied of their fuel and parked at the facility. No fuel is to be left in the tank truck when it is not in use during non-working hours.

2.9 BRITTLE FRACTURE [40 CFR 112.7(i)]

Field constructed aboveground containers are to be evaluated for brittle fracture whenever they undergo a repair, alteration, reconstruction, or change in service that may affect the risk of a discharge or failure due to brittle fracture or other catastrophe. No field-constructed ASTs are present at this facility.

2.10 CONFORMANCE WITH APPLICABLE REQUIREMENTS [40 CFR 112.7(j)]

Conformance and nonconformance with the applicable requirements of 40 CFR Part 112 is addressed in each section throughout this Plan.

3.0 REQUIREMENTS FOR ONSHORE FACILITIES [40 CFR 112.8]

The SPCC requirements for onshore facilities are discussed in the sections below.

3.1 FACILITY DRAINAGE [40 CFR 112.8(b)]

All surface drainage for the facility is via sheet flow to the north towards either Post Oak Creek located 0.46-miles northeast of the Site or Devil's Branch located 0.18-miles to the northwest. Drainage is depicted in Figure 2.0. Drainage from the secondary containment the tanks are located in is restrained via a manually operated ball valve. This valve is located within an empty 55-gallon drum that is 3/4 buried in the ground surface. This drum protects the valve and allows access to it. Secondary containment drainage is discussed in section 3.2.3.

3.2 BULK STORAGE CONTAINERS [40 CFR 112.8(c)]

All aboveground storage tanks that are not in use at this facility are to be labeled "NOT IN USE" and are to have the flow control valves and hoses disconnected. Tanks that are not in use are to be kept vented and large openings are to be kept closed. When these tanks are returned to service, they are to be provided with secondary containment, all as required by the Rule [40 CFR 112.8(c)(1)].

3.2.1 Storage Container Construction and Materials [40 CFR 112.8(c)(1)]

All tanks are reportedly constructed according to American Petroleum Institute, American Society for Testing and Materials, or Underwriters Laboratory specifications. The tank materials and construction are compatible with the stored product at stored pressure and temperature.

3.2.2 Secondary Containment

The secondary containment for the ASTs is listed in Table 2-1. The containment is adequate to contain the contents of the ASTs plus sufficient freeboard to allow for precipitation. See Appendix E for the calculations used to determine the secondary containment's adequacy.

The containment area walls and floor are constructed of poured concrete and is expected to be sufficiently impervious to spilled material. However, it is recommended that management periodically test the integrity of the containment systems by flooding them with water. If the containment will not hold water, management shall repair any leaks.

It is recommended that management have the electrical installations inside the containment inspected by a licensed electrician at its earliest opportunity. Pumping motors and related electrical conduits are mounted inside the containment in a position where they may become submerged in petroleum products should a tank rupture occur. Electrical equipment should be inspected to verify it is intrinsically safe, i.e. explosion proof.

Approximately twenty-two 55-gallon drums and smaller-capacity containers of motor oil are stored within the warehouse of the facility. These materials are for retail sale. The 55-gallon drums stored outside the building are either empty or store spent absorbents and are routinely disposed offsite by MFA; therefore, a containment for these drums is not needed. The majority of the portable tanks are those that MFA Oil leases to agricultural operations located throughout the area. When these portable tanks are stored at the facility, they are empty, not in use, all connections and hoses have been disconnected and blanked off and all valves have been closed. Since the portable ASTs are empty and closed, they are not provided with secondary containment.

3.2.3 Drainage of Storm Water

For the AST secondary containment, precipitation shall be promptly removed from the secondary containment to ensure their available capacity. All releases of precipitation from the containment areas must comply with storm water discharge permits and regulations. An inspection of the storm water must be conducted to ensure compliance with applicable water quality standards prior to precipitation discharge. The drainage valve must be returned to a closed position following the removal of the storm water.

Absorbent materials are to be used to remove the visible oil if the precipitation within the containment shows any evidence of visible oil. If this procedure is not adequate for removing the visible oil, a qualified clean-up contractor is to be employed to pump the precipitation from the affected containment area into temporary storage tanks and disposed offsite by an approved vendor. Precipitation removal is to be documented in Appendix F of this document.

3.2.4 Underground Storage Tanks

There are no underground storage tanks located at this facility.

3.2.5 Partially Buried Storage Tanks

There are no partially buried tanks located at this facility.

3.2.6 Aboveground Storage Container Integrity Testing and Inspection

The ASTs are to be subjected to periodic integrity testing using techniques such as hydrostatic testing, visual inspection or non-destructive shell thickness tests. Corrective measures shall be made for all discrepancies observed. Specific AST inspection details are provided in Appendix C.

3.2.7 Heating Coils

There are no storage tanks with heating coils located at this facility.

3.2.8 Alarm Systems [40 CFR 112.8(c)(8)]

Tanks are gauged regularly by facility personnel, via sight gauges and/or visual observations, to check product height. In addition, when the facility is receiving fuel or oil, the product height is continually monitored as each tank is nearing full capacity. The ASTs within the concrete containment are equipped with high level automatic shutoff devices, which act as overfill protection devices. The B-99 tanks are not equipped with overfill alarms or shutoffs; however, tank loading activities are conducted directly at each tank and the operator should be able to observe any releases that occur due to his/her activities.

3.2.9 Treatment Facilities [40 CFR 112.8(c)(9)]

There are no treatment facilities for this location.

3.2.10 Visible Oil Leaks [40 CFR 112.8(c)(10)]

If visible oil leaks from container seams, gaskets, piping, pumps, valves, rivets, or bolts are observed they shall be promptly corrected. Any accumulation of oil in diked areas shall be promptly removed.

3.2.11 Mobile or Portable Containers [40 CFR 112.8(c)(11)]

Various portable tanks are located at the facility. These tanks range from 300 gallons to 2,000 gallons in capacity. The majority of the portable tanks are those that MFA Oil leases to agricultural operations located throughout the area. When these portable tanks are stored at the Warrensburg facility, they are empty, not in use, all connections and hoses have been disconnected and blanked off and all valves have been closed. Since the portable ASTs are empty and closed. they are not provided with secondary containment. Drums are also staged at the facility (see Section 3.2.2).

3.3 FACILITY TRANSFER OPERATIONS, PUMPING AND IN-PLANT PROCESS [40 CFR 112.8(d)]

i) Product piping from the ASTs to the ground is steel and is aboveground. Product piping from the ground surface to the dispensers is fiberglass and is underground. Any current or future buried piping will be provided cathodic protection or otherwise satisfy the corrosion standards of the applicable State program.

ii) Connections of oil pipelines and facility piping are to be kept securely capped or blank-flanged when not in service or in standby service for an extended period of time. This may be accomplished by installing a valve at the end of a piping connection and enclosing the valve in a lockable fill port box. Said fill port box shall be so designed that the valve cannot be operated until the box is unlocked and opened.

iii) Pipe supports are designed to minimize abrasion and corrosion, and allow for expansion and contraction.

iv) Aboveground valves and pipelines shall be regularly examined by operating personnel. During the examination, the general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces are addressed. Integrity and leak testing of buried piping shall be conducted during installation, modification, construction, relocation, or replacement.

v) All aboveground piping is positioned away from regular vehicle traffic.

APPENDIX A

DISCHARGE PREVENTATIVE MEASURES

Discharge Preventive Measures
MFA Warrensburg BP & PC

The following discharge prevention measures are followed at the bulk plant.

A1.0 Aboveground Storage Tanks

- Tanks are to be monitored during filling to avoid overfilling.
- Tanks are to be inspected in accordance with Appendix C.
- All valves, with the exception of active product lines, are to be maintained in the closed position.

A2.0 Drum Storage Areas

- Drum storage areas are to be inspected regularly to check for leaks or drum deterioration.
- Drums are to be properly labeled to indicate contents.
- Drums are to be kept closed when not in use.
- Employees shall be present while drum contents are being transferred or dispensed to avoid leaks and spills.

A3.0 Tank Truck Loading/Offloading

Prior to tank truck loading and offloading, the following procedures are to be followed.

- Prior to delivery, a fuel offloading schedule is to be prepared.
- The vehicle is to be parked on the offloading containment (if available).
- The vehicle's motor and lights are to be turned off. The parking brake is to be set.
- The driver is to inspect the liquid level in the tank.
- Outlet valves are to be checked to assure they are closed.
- A grounding wire is to be attached to the truck.

During loading/offloading the following procedures are followed.

- The vehicle's engine is to remain off.
- Flow is to be started slowly.
- The driver is to stay out of the vehicle to monitor the offloading and contain any spills or leaks that occur.
- Smoking shall be prohibited during the offloading procedure.

After loading/unloading operations are completed, the following procedures are to be followed.

- The driver is to check the liquid level of the tank versus the compartment marker on the truck.
- All valves are to be closed.

A4.0 Dispensing

During dispensing of fuel the following procedures are to be followed.

- The vehicle's engine is to remain off.
- Flow is to be started slowly by the customer.
- The Plant Manager or other employees are to monitor the fuel dispensing and contains any spills or leaks that occur.
- Smoking shall be prohibited during the dispensing procedure.

APPENDIX B

OIL SPILL CONTINGENCY PLAN

Oil Spill Contingency Plan

B1.0 Notification Procedure

In the event of an oil or fuel spill, facility personnel on-duty is to take ***immediate*** action to comply with the Reporting Procedures set out in this plan. Detailed instructions on the information to be reported and the phone numbers to be contacted are included in the MFA Reporting Procedures in Appendix G. Applicable federal, state, and local agencies phone numbers are provided on the Emergency Notification Phone List at the end of this appendix.

The law requires immediate notification of the Missouri Department of Natural Resources and the National Response Center (listed on the Emergency Notification Phone List) for spills that meet any of the following criteria:

- If the spill is estimated to be 50 gallons. For spills estimated to be greater than 1,000 gallons, the National Response Center must also be notified, or
- If the spill is hazardous or poses a threat to human health, or is detrimental to aquatic and terrestrial species of plants or animals, or
- If the spill threatens to or results in contamination of underground or surface water, or
- If the spill violates applicable water quality standards, or
- If the spill is sufficient to cause film sheen on, or discoloration of the surface of the water or adjoining shorelines, or causes a sludge or emulsion to be deposited in harmful quantities into or upon the waters of the United States or adjoining shorelines or roadside ditches.

B2.0 Spill Contingency Plan

In the event of a sudden or non-sudden release of oil or oil-based product to the environment, the notification procedure is to be initiated and the following procedures should be used to contain or limit and clean-up the spill. Due to the potential impact to the surrounding environment, immediate action to contain and clean up the release must be implemented.

All actions to limit the extent of the spill should be undertaken with care and judgment to avoid risk of injury to personnel and minimize impact on the environment. The objective of the response action is to minimize the environmental damage and to contain the spill within the facility property boundaries.

The following criteria are to be used in assessing the site personnel response type to the spill:

- Spills of any size of diesel fuel or other Class III combustible liquid can be responded to by site personnel. If possible, work upwind of the spill when applying absorbent materials or during other activities conducted adjacent to the spill area. Motorized equipment can be used to assist the construction of containment structures (trenches or diking) without restriction.
- Spills of gasoline which result (or could result, in the case of continuing leakage) in spill pools of more than 200 square feet (SF) are not to be responded to by site personnel due to the potential for flash fire. Using the notification procedures described in Appendix G, advise home office personnel from the site to a safe location well away from the spill area and not downwind. Turn off any spark producing equipment in the downwind are of the spill area. Advise any emergency personnel responding to the spill (fire department, MFA personnel, spill cleanup personnel, etc.) of the nature of the release and potential flash fire hazard.

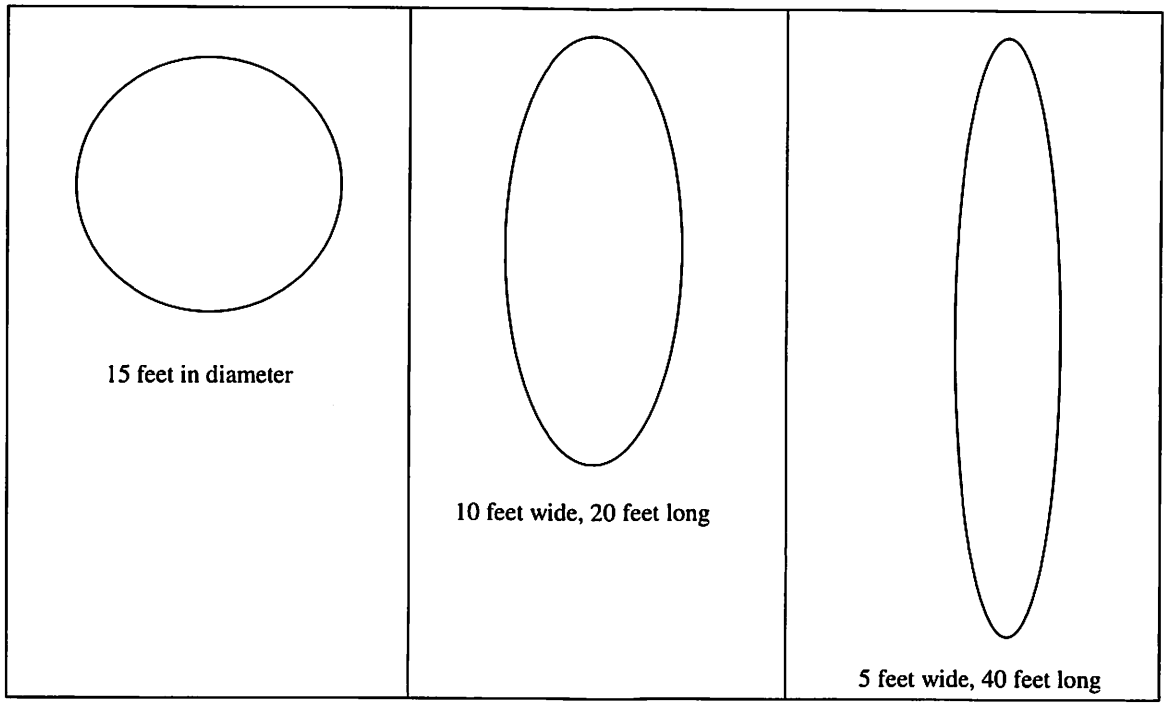
- Spills of gasoline which result in spill pools less than 200 SF can be responded to defensively by site personnel, using appropriate caution. Observing the site wind direction indicator (flag or windsock), work ONLY upwind of the spill area. If the spill cannot be approached from upwind due to buildings, walls, fences, etc., use the procedures above and DO NOT take defensive actions. Turn off any spark producing equipment downwind of the spill. Do not use motorized equipment to construct containment structures, unless it can be used entirely on the upwind side of the spill area.

- Spills of gasoline which result in spill pools less than 25 SF can be responded to by site personnel, using appropriate caution. If possible, approach the spill area from the upwind side; however, the spill can be approached from another direction if necessary. Use of motorized equipment to contain such a spill will normally not be necessary and is generally not advised. Shut off or move spark producing equipment within 20 feet of the spill area.

Personnel responding to a spill of any petroleum product should wear appropriate personal protective equipment, including impervious boots and gloves.

The following guidelines can help in estimating spill sizes:

For 200 SF spills:

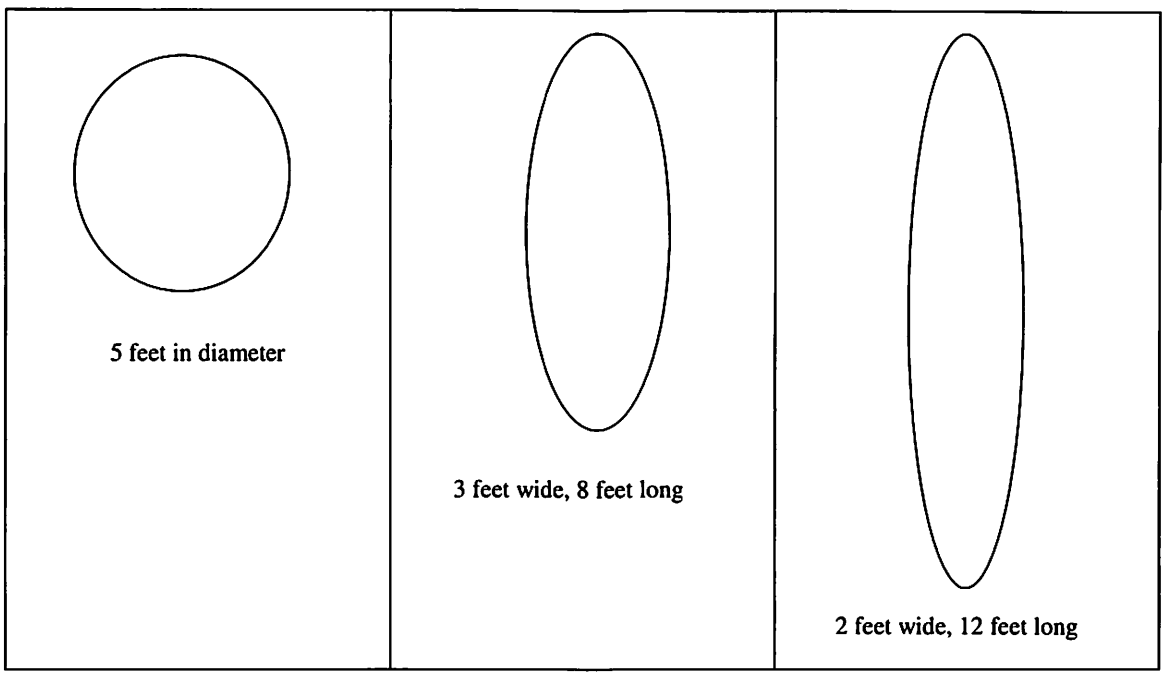


15 feet in diameter

10 feet wide, 20 feet long

5 feet wide, 40 feet long

For 25 SF spills:



5 feet in diameter

3 feet wide, 8 feet long

2 feet wide, 12 feet long

B2.1 Spill Response Procedures - Facility Personnel:

Those procedures should be followed:

(1) Upon observing a spill, immediately initiate the MFA Reporting Procedures listed in Appendix G;

(2) Take prompt emergency remedial action to contain the spill without risking personnel safety. (See Section B 2.0 for spill size criteria to be used in assessing the level of response by facility personnel.) Emergency response equipment to be used is listed in section B5.0;

(3) Identify and verify the character, exact source, amount and area covered by released material at the facility;

(4) Assess the possible direct and indirect hazards including fire or explosion, to human health or the environment that may result from the release;

(5) The Johnson County Emergency Coordinator will be notified at (660) 747-2666 of any reportable spill and the appropriate response procedures initiated according to the situation;

(6) The Fire Department is to be notified and is to stand by for all spill situations where the possibility of fire ignition exists;

(7) If necessary, the MFA Director of Environmental, Health & Safety is to contact outside contractors for support;

(8) In the event of spills, the MFA Director of Environmental, Health & Safety is to send personnel trained in spill control to the site to contain and clean-up any spills; and,

(9) The MFA Director of Environmental, Health & Safety will follow-up on all reportable spills with a written report submitted to the EPA Region VII and the Missouri Department of Natural Resources.

B3.0 Spill Control Procedures

An oil or fuel spill incident could occur at the facility from the following situations:

- Fuel line rupture
- Storage tank rupture
- Spill during tank truck loading or offloading operations

Potential spill scenarios were listed in Section 2.2 of this SPCC Plan. See the previous page for spill size criteria to be used in assessing the level of response by facility personnel. Should a spill incident occur facility personnel will immediately implement the reporting procedures set out on Appendix G and the following spill control measures:

(1) Turn off pump or pumps if applicable.

(2) Ensure that spilled oil is contained as outlined in Section B4.0, Countermeasure Procedures.

(3) Pump spilled oil into a recovered oil tank. If the spill volume is greater than the recovered oil tank, call a qualified contractor to pump spilled oil into a tank truck for delivery to an approved treatment and disposal facility.

B4.0 Countermeasure Procedures

Countermeasure procedures are designed to contain and clean-up the effects of an oil spill that could impact receiving water bodies. Incident specific considerations and precautions must be implemented during each spill incident to adequately protect human health and the environment. See Section B2.0 for spill size criteria to be used in assessing the level of response by facility personnel.

For all spills that reach a surface waterway and any spills that result in a significant degree of soil contain, the MFA Director of Environmental, Health & Safety is to be contacted to provide emergency response services and consultation.

The facility's countermeasure procedures are outlined below.

- Containment: Containment activities are to be initiated as soon as possible to prevent spreading of the spilled material. Containment techniques include, but are not limited to:
    - Trenching – Dig a trench around the area to collect the spill where it can be safely removed. If time allows, line the trench with plastic or similar material.
    - Diking – Dike the spill with dirt, sandbags, or other absorbent materials that will contain the spill, using shovels, front-end loader, or other available resources.
    - Booms and Absorbents – Use large quantities of absorbent materials, including dirt, sand, vermiculite, clay, absorbents, etc., to soak up and contain the spill by direct application.

- Removal: Once the spill is contained, the oil is to be removed. Removal techniques include, but are not limited to:
    - Pumps
    - Absorbent materials such as pads, pillows, booms, oil-dry, cat litter, etc.
    - Skimmers

- Disposal: This includes recycling any recovered oil, disposing of abatement materials used to contain or remove the spilled material, and excavating contaminated soil. Disposal techniques include, but are not limited to:
    - Recycling
    - Disposal at an appropriate facility
    - Landfarming

B5.0 Emergency Response Equipment Location

The following table identifies the type and location of the emergency response equipment, including personal protective equipment, available at the facility.

Equipment	Location
Absorbent Granules	Warehouse
Pads	
Hand Tools	
Booms	

EMERGENCY NOTIFICATION PHONE LIST

CONTACT LIST	RESPONSIBLE ROLE	PHONE NUMBER
CONTACTS		
Carla Mathes, Manager Tracy Barth, MFA Director, EH&S Also see Appendices B and G	Notification of response agencies; spill reporting	(660) 747-8895 office (816) 258-3199 cell (573) 999-2489 cell (573) 442-6455 home (573) 876-0381 office
GOVERNMENTAL CONTACTS		
National Response Center	Incident reporting (if required)	1 (800) 424-8802
Federal On-Scene Coordinator (EPA Region VII)	Incident reporting; Spill response assistance	(913) 281-0991 or (913) 551-7000
State Emergency Response Commission (SERC)	Incident reporting	1 (800) 780-1014
Missouri Department of Natural Resources	Incident reporting; Spill response assistance	(573) 634-2436
Fire Department / Police Department	Traffic and crowd control; Evacuation assistance	911
EMERGENCY RESPONSE CONTRACTORS:		
Environmental Works	Spill response and clean up resources	(417) 890-9500 (office) (877) 827-9500 (24-hour)
OTHER CONTACTS		
National Weather Service (Pleasant Hill, MO)	Weather reports	(816) 540-6021
Local Radio KTBG 90.9 FM - Warrensburg KWKJ 98.5 FM - Windsor	Public information	 1(866) 909-2743 (660) 747-9191
Missouri One-Call	Utility location	1(800) 344-7483
Western Missouri Medical Center 403 W. Burkarth Road Warrensburg, MO	Medical assistance	(660) 747-2500

Post a copy of this list at each telephone.

APPENDIX C

ABOVEGROUND STORAGE TANK INSPECTION FORMS (MONTHLY and ANNUAL)

SPCC Monthly Aboveground Storage Tank Inspection Report
MFA Warrensburg Bulk Plant and Petro-Card

Keep a copy of this completed report with the SPCC plan.

Date/Time: _____ Weather Conditions: _____
Inspector's Name: _____ Inspector's Signature: _____

Next to the inspection items, write the letter Y or N to indicate whether any evidence of that inspection item exists. If the response is Y, then explain in the comment section.
NA= Not Applicable

Inspection Item	Yes	No	Yes	No	Yes	No
	Containment for Tanks 4-8		Containment for Tank 9		Containment for Tank 10	
Tank Containment						
Water in secondary containment, interstitial space or spill container?						
Debris or fire hazard in containment?						
Drain valves operable and in a closed position?						
Containment egress pathways clear and gates/doors operable?						

	Tank 4: 12,000-gal. Unleaded Gasoline		Tank 5: 12,000-gal. Unleaded Plus		Tank 6: 15,000-gal. No. 2 Red Diesel		Tank 7: 15,000-gal. No. 2 Red Diesel		Tank 8: 16,500-gal. No. 2 Clear Diesel		Tank 9: 1,000-gal. B-99		Tank 10: 1,000-gal. B-99	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Leak Detection														
Visible signs of leakage around the tank, concrete pad, containment, ringwall or ground?														
Visible signs of leakage underneath fuel dispensers?														
Tank Attachments and Appurtenances														
Ladder and platform structure secure with no sign of severe corrosion or damage?														
Tank Liquid Level gauge readable and in good condition?														
Check all tank openings are properly sealed.														
Other Conditions														
Are there other conditions that should be addressed for continued safe operation or that may affect the Site SPCC plan?														

Specific Observations/Comments: _____

SPCC Annual Aboveground Storage Tank Inspection Report
MFA Warrensburg Bulk Plant and Petro-Card

Keep a copy of this completed report with the SPCC plan.

Date/Time: _____ Weather Conditions: _____
Inspector's Name: _____ Inspector's Signature: _____

Next to the inspection items, write the letter Y or N to indicate whether any evidence of that inspection item exists. If the response is Y, then explain in the comment section.
NA= Not Applicable

Inspection Item	Yes	No	Yes	No	Yes	No
	Containment for Tanks 4-9		Containment for Tank 9		Containment for Tank 10	
Tank Containment						
Containment structure in satisfactory condition?						
Drainage pipes/valves fit for continued service?						

	Tank 4: 12,000-gal. Unleaded Gasoline		Tank 5: 12,000-gal. Unleaded +		Tank 6: 15,000-gal. No. 2 Red Diesel		Tank 7: 15,000-gal. No. 2 Red Diesel		Tank 8: 16,500-gal. No. 2 Clear Diesel		Tank 9: 1,000-gal. B-99		Tank 10: 1,000-gal. B-99	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Tank Foundation and Supports														
Evidence of tank settlement or foundation washout?														
Cracking or spalling of concrete pad or ring wall?														
Tank supports in satisfactory condition?														
Water able to drain away from tank?														
Grounding strap secured and in good condition?														
Cathodic Protection (CP)														
CP System functional?														
Rectifier Reading:														
Tank External Coating														
Evidence of paint failure?														
Tank Shell/Heads														
Noticeable shell/head distortions, buckling, denting or bulging?														
Evidence of shell/head corrosion or cracking?														
Tank Manways, Piping and Equipment within Secondary Containment														
Flanged connection bolts tight and and fully engaged with no sign of water or corrosion?														

	Tank 4: 12,000-gal. Unleaded Gasoline		Tank 5: 12,000-gal. Unleaded +		Tank 6: 15,000-gal. No. 2 Red Diesel		Tank 7: 15,000-gal. No. 2 Red Diesel		Tank 8: 16,500-gal. No. 2 Clear Diesel		Tank 9: 1,000-gal. B-99		Tank 10: 1,000-gal. B-99	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Tank Roof														
Standing water on roof?														
Evidence of coating, cracking, crazing, peeling, or blistering?														
Holes in roof?														
Venting														
Vents free of obstructions?														
Emergency vent operable? Lift as required?														
Insulated Tanks (no insulated tanks present at this facility)														
Insulation missing?	NA													
Are there noticeable areas of moisture on the insulation?	NA													
Mold on the insulation?	NA													
Insulation exhibiting damage?	NA													
Is the insulation sufficiently protected from water intrusion?	NA													
Level of Overfill Prevention Instrumentation of Shop-Fabricated Tanks														
Has the tank liquid level sensing device been tested to ensure proper operation?														
Does the tank liquid level sending device operate as required? Are the overfill prevention devices in proper working condition?														
Electrical Equipment														
Are tank grounding lines in good condition?														
Is electrical wiring for control boxes/lights in good condition?														

Specific Observations/Comments

APPENDIX D

EMPLOYEE TRAINING AND BRIEFING ATTENDANCE RECORDS

EMPLOYEE TRAINING AND BRIEFING ATTENDANCE RECORDS
MFA Warrensburg BP & PC

Keep this attendance record with the SPCC Plan

Instructor's Name	Date	Employee's Name	SPCC Training or Briefing?

APPENDIX E

SECONDARY CONTAINMENT CALCULATIONS

SECONDARY CONTAINMENT VOLUME CALCULATIONS FOR VERTICAL TANK FARMS

SUMMARY	
LOCATION:	Warrensburg, MO
CONTAINMENT DESCRIPTION:	Bulk Storage
LARGEST TANK VOLUME:	15,000
NET CONTAINMENT VOLUME:	17,424
CONTAINMENT SIZED APPROPRIATELY:	YES

Net containment for all bulk storage needs to be 110% of the capacity of the largest vessel.

Mathematic Formulas:

radius = c/2π
cubic volume = l x w x h
cylindric volume = π x r^2 x h
net volume = gv - ov
needed net volume = tv x 110%

Conversion Factors:

7.48052 gal = 1 ft^3

Largest Tank Capacity:

Tank Name: Tank # 6

TANK VOLUME: 15,000 **gallons**

Gross Volume of Containment (gv):

Gross Volume = l x w x h

Dimension	Measurement (ft)
length =	45.00
width =	28.83
height =	2.75

GROSS VOLUME = **3,568** **ft^3** or **26,691** **gallons**

Occupied Volume of Containment (ov):

Tank Displacement Volume = π x r^2 x (containment height - pad height)

Tank Name	Circumference (ft)	Radius (ft)	Containment Height (ft)	Displaced Volume in Containment (ft^3)
Tank 4	34.83	5.55	2.75	217.36
Tank 5	34.83	5.55	2.75	217.36
Tank 7	34.83	5.55	2.75	217.36
Tank 8	34.83	5.55	2.75	217.36
Day Tank 1	5.76	0.92	1.92	5.06
Day Tank 2	5.76	0.92	1.92	5.06
Day Tank 3	5.76	0.92	1.92	5.06
Day Tank 4	5.76	0.92	1.92	5.06
Pumps (4)	2.09	0.33	1.75	2.44
Total Volume Displaced by Tanks Within Containment =				**892.12** ft^3

Pad Displacement Volume = $\pi \times r^2 \times$ pad height

Pad Name	Circumference (ft)	Radius (ft)	Pad Height (ft)	Displaced Volume (ft^3)
Pad 4	39.25	6.25	0.50	61.33
Pad 5	39.25	6.25	0.50	61.33
Pad 6	39.25	6.25	0.50	61.33
Pad 7	39.25	6.25	0.50	61.33
Pad 8	39.25	6.25	0.50	61.33
Total Volume Displaced by Tank Pads =				**306.64** ft^3

Misc. Items in Containment	Raw Data	Formula or Regulation Applied	Displaced Volume (ft^3)
Piping	Visual Inspection	Engineering Estimation	40.10
Total Volume Displaced by Miscellaneous Items =			**40.10** ft^3

OCCUPIED VOLUME = **1,238.86** **ft^3** or **9,267** **gallons**

Net Volume of Containment Verification:

TANK VOLUME (gal)	GROSS VOLUME (gal)	OCCUPIED VOLUME (gal)	ACTUAL NET VOLUME (gal)	NEEDED NET VOLUME (gal)
15,000	26,691	9,267	17,424	16,500

SECONDARY CONTAINMENT VOLUME CALCULATIONS FOR HORIZONTAL TANKS

SUMMARY	
LOCATION:	Warrensburg, MO
CONTAINMENT DESCRIPTION:	First B-99 Containment
LARGEST TANK VOLUME:	1,000
NET CONTAINMENT VOLUME:	1,223
CONTAINMENT SIZED APPROPRIATELY:	YES

Net containment for all bulk storage needs to be 110% of the capacity of the largest vessel.

Mathematic Formulas:

radius = c/2π
cubic volume = l x w x h
cylindric volume = $\pi \times r^2 \times h$
net volume = gv - ov
needed net volume = tv x 110%

Conversion Factors:

7.48052 gal = 1 ft^3

Largest Tank Volume (tv):

Tank Name: B-99 Tank # 2 **TANK VOLUME:** 1,000 **gallons**

Gross Volume of Containment (gv):

gross volume = l x w x h

Dimension	Measurement (ft)
length =	13.17
width =	6.08
height =	2.04

GROSS VOLUME = 164 ft^3 or 1,223 **gallons**

No items are present within the containment that are likely to sufficiently displace fluids.

Net Volume of Containment Verification:

actual net volume = gv-ov
needed net volume = tv x 110%

TANK VOLUME (gal)	GROSS VOLUME (gal)	OCCUPIED VOLUME (gal)	ACTUAL NET VOLUME (gal)	NEEDED NET VOLUME (gal)
1,000	1,223	0	1,223	1,100

SECONDARY CONTAINMENT VOLUME CALCULATIONS FOR HORIZONTAL TANKS

SUMMARY	
LOCATION:	Warrensburg, MO
CONTAINMENT DESCRIPTION:	Second B-99 Containment
LARGEST TANK VOLUME:	1,000
NET CONTAINMENT VOLUME:	1,293
CONTAINMENT SIZED APPROPRIATELY:	YES

Net containment for all bulk storage needs to be 110% of the capacity of the largest vessel.

Mathematic Formulas:

radius = c/2π
cubic volume = l x w x h
cylindric volume = $\pi \times r^2 \times h$
net volume = gv - ov
needed net volume = tv x 110%

Conversion Factors:

7.48052 gal = 1 ft^3

Largest Tank Volume (tv):

Tank Name: B-99 Tank # 2 **TANK VOLUME:** 1,000 **gallons**

Gross Volume of Containment (gv):

gross volume = l x w x h

Dimension	Measurement (ft)
length =	15.50
width =	6.08
height =	1.83

GROSS VOLUME = **173** **ft^3** or **1,293** **gallons**

No items are present within the containment that are likely to sufficiently displace fluids.

Net Volume of Containment Verification:

actual net volume = gv-ov
needed net volume = tv x 110%

TANK VOLUME (gal)	GROSS VOLUME (gal)	OCCUPIED VOLUME (gal)	ACTUAL NET VOLUME (gal)	NEEDED NET VOLUME (gal)
1,000	1,293	0	1,293	1,100

SECONDARY CONTAINMENT VOLUME CALCULATIONS FOR LOADING RACKS

SUMMARY	
LOCATION:	Warrensburg, MO
CONTAINMENT DESCRIPTION:	Loading Rack
LARGEST TANK VOLUME:	700
NET CONTAINMENT VOLUME:	1,516
CONTAINMENT SIZED APPROPRIATELY:	YES

Net containment for all bulk storage needs to be 110% of the capacity of the largest vessel.

Mathematic Formulas:

radius = c/2π
cubic volume = l x w x h
cylindric volume = π x r^2 x h
net volume = gv - ov
needed net volume = tv x 110%

Conversion Factors:

7.48052 gal = 1 ft^3

Largest Tanker Compartment Volume (tv):

TANK VOLUME: 700 **gallons**

Gross Volume of Containment (gv):

gross volume = l x w x h

Dimension	Measurement (ft)
length =	32.42
width =	12.50
height =	0.50

GROSS VOLUME = **203** **ft^3** or **1,516** **gallons**

Net Volume of Containment Verification:

actual net volume = gv-ov
needed net volume = tv x 110%

TANK COMPARTMENT VOLUME (gal)	CONTAINMENT VOLUME (gal)	NEEDED NET VOLUME (gal)
700	1,516	770

APPENDIX F

SECONDARY CONTAINMENT/
DIKED AREA DRAINAGE INSPECTION FORM

Petroleum Storage
Secondary Containment/
Diked Area Drainage Inspection Form
MFA Warrensburg BP & PC

Any discharge of water from a petroleum tank secondary containment or diked area is not allowed to have any sheen. There shall be no discharge of visible oil, floating solids or visible foam in other than trace amounts.

Date	Time Valve Opened / Pump Activated	Time Valve Closed / Pump Activated	Was water from the secondary containment allowed to discharge onto the ground?	Inspector's Signature	Type of Absorbent Material Used

APPENDIX G

REPORTING PROCEDURES

REVISED REPORTING PROCEDURES FOR LEAKS, SPILLS & OVERFILLS OF REFINED OILS

Any Employee of MFA Oil Company or MFA Petroleum Company, including but not limited to, supervisors, managers, driver/salesmen, clerks, bookkeepers, and transport drivers, who has knowledge of any leak, spill or overfill of refined oils shall immediately report such a release to one of the following company home office personnel:

Tracy Barth	**(573)-876-0381 Office**
	(573)-442-6455 Home
	(573)-999-2489 Cell
Dan Creek	**(573)-219-5785 Office**
	(573)-814-2252 Home
	(573)-823-5473 Cell #1
	(573)-489-9456 Cell #2
Kenny Rawlings	**(573)-239-3562 Cell**
	(573)-392-7462 Home/Office
Melvin Schebaum	**(573)-876-0333 Office**
	(573)-819-9600 Cell
	(573)-635-6133 Home

You should continue to call the above names in order until such time you actually talk to an individual. If you receive a voicemail or answering machine for any of the above individuals, leave a message as to the nature of the product release and a telephone number where the above individuals may contact you.

Once you have reported the release to one of the home office personnel by talking to that individual listed above, it will be their responsibility to immediately notify the National Response Center (NRC) and your state environmental regulatory authority.

If you are unable to reach one of the home office personnel on this list, you must then, and only then, report the incident to the National Response Center (NRC) and your state regulatory authority at the phone numbers listed below:

National Response Center (NRC) – (800)-424-8802
Missouri Department of Natural Resources (MDNR) – (573)-634-2436

Revised: October 30, 2008

APPENDIX H

5-YEAR REVIEW & EVALUATION

5-YEAR REVIEW & EVALUATION

A review and evaluation of this SPCC Plan must be performed as required under 40 CFR 112.5(b).

Name of person completing the evaluation: Dan Creek

Signature of person completing the evaluation: Dan Creek

Date: 11/03/15

Describe all necessary changes to the SPCC Plan below.

Revised pages iv, vi, 2-1, Fig. 32.0, 2-6, 2-8, App. B & App. C to reflect management changes, update emergency contact information, and update products stored onsite.

Note: The SPCC Plan must be amended within 6 months of the review date to include more effective prevention technology if it will significantly reduce the likelihood of a discharge [as defined in 112.7(b)]. All changes must be implemented within 6 months of the amendment.

5-YEAR REVIEW & EVALUATION

A review and evaluation of this SPCC Plan must be performed as required under 40 CFR 112.5(b).

Name of person completing the evaluation: _____

Signature of person completing the evaluation: _____

Date: _____

Describe all necessary changes to the SPCC Plan below.

Note: The SPCC Plan must be amended within 6 months of the review date to include more effective prevention technology if it will significantly reduce the likelihood of a discharge [as defined in 112.7(b)]. All changes must be implemented within 6 months of the amendment.

5-YEAR REVIEW & EVALUATION

A review and evaluation of this SPCC Plan must be performed as required under 40 CFR 112.5(b).

Name of person completing the evaluation: _____

Signature of person completing the evaluation: _____

Date: _____

Describe all necessary changes to the SPCC Plan below.

Note: The SPCC Plan must be amended within 6 months of the review date to include more effective prevention technology if it will significantly reduce the likelihood of a discharge [as defined in 112.7(b)]. All changes must be implemented within 6 months of the amendment.

APPENDIX I

STORMWATER POLLUTION PREVENTION PLAN, WRITTEN BY MFA OIL, INC.

STORM WATER POLLUTION PREVENTION PLAN
MFA OIL COMPANY
Warrensburg, MO Bulk Plant and Petro Card

TABLE OF CONTENTS

CHAPTER 1 INTRODUCTION
1.1 Purpose of the SWPPP....2
1.2 BMP Implementation Committee....2
1.3 Implementation Schedule....2
1.4 Protocol on Public Access to the SWPPP....2
1.5 Updating the SWPPP....2

CHAPTER 2 SITE LOCATION AND GENERAL ENVIRONS
2.1 General Nature of Facility Activities....3
2.2.Map of General Environs....3
2.3 Map of Facility Layout....3
2.4 Description of Storm Drainage System and Outfalls....3

CHAPTER 3 DESCRIPTION OF POTENT1AL SOURCES OF POLLUTION
3.1 Fuel Loading/Unloading Area....4

CHAPTER 4 POTENTIAL POLLUTANTS
4.1 Significant Materials That May Come in Contact With Storm Water....4
4.2 Spills of Significant Materials after April 17, 1994....4

CHAPTER 5 STEPS TO REDUCE POLLUTION - BOTH OLD AND NEW
5.1 Assignments to Implement the BMPs....4
5.2 Fuel Loading/Unloading Area....4
5.3 Employee Training....5

CHAPTER 6 MONITORING AND RECORD KEEPING
6.1 Checking on New BMP Implementation....5
6.2 Record Keeping....5
6.3 Comprehensive Site Compliance Evaluation....5

CHAPTER 7 CERTIFICATIONS AND SIGNATURES....6

APPENDICES
Appendix A Maps
Appendix B Worksheets
Appendix C Notice of Intent

CHAPTER 1
INTRODUCTION

GENERAL PERMIT

In compliance with the Missouri Clean Water Law, (Chapter 644 R.S. Mo.), and the Federal Water Pollution Control Act (Public Law 92-500, 92nd Congress), Missouri State Operating Permit MO-G350261 (hereafter referred to as the "permit") was issued to MFA Oil Company by the Missouri Department of Natural Resources (DNR). This permit requires the Warrensburg Bulk Plant and Petro Card (hereafter referred to as the "facility") to develop and implement of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP must be kept on-site and should not be sent to DNR unless specifically requested. The permittee shall select, install, use, operate, and maintain the Best Management Practices prescribed in the SWPPP in accordance with the concepts and methods described in the following document:
Storm Water Management For Industrial Activities, Developing Pollution Prevention Plans and Best Management Activities, (Document number EPA 832-R-92-006) published by the United States Environmental Protection Agency (USEPA) in September 1992.

The SWPPP must include the following:

(a) An assessment of all storm water discharges associated with the facility. This must include a list of potential contaminants and an annual estimate of amounts that will be used in the described activities.

(b) A listing of Best Management Practices (BMPs) and a narrative explaining how BMPs will be implemented to control and minimize the amount of potential contaminants that may enter storm water.

(c) A schedule for implementing the BMPs.

(d) The SWPPP must include a schedule for a monthly site inspection and a brief written report. The inspections must include observation and evaluation of BMP effectiveness, deficiencies, and corrective measures that will be taken. Deficiencies must be corrected within seven days and the WPCP must be notified by letter. Any corrective measure that necessitates major construction may also need a construction permit.

(e) Inspection reports must be kept on site with the SWPPP. These must be made available to DNR personnel upon request.

(f) A provision of designating an individual to be responsible for environmental matters.

(g) A provision for providing training to all personnel involved in material handling and storage, and housekeeping of areas
having materials exposed to stormwater. Proof of training shall be submitted on request of DNR.

(h) Implementation of the SWPPP must begin no later than 12 months after receipt of the permit.

A copy of the permit is at the back of this Storm Water Pollution Prevention Plan. The original is kept at MFA Oil Company located at One Ray Young Drive in Columbia, Missouri.

1.1 Purpose of the SWPPP

The permit requires the preparation of a Storm Water Pollution Prevention Plan (SWPPP). It describes the measures that we will take as specified in our permit. This plan is to be kept on the premises at the office.

1.2 BMP Implementation Committee

The Permit requires that the SWPPP identify personnel to oversee the implementation of any measures to reduce pollution (called Best Management Practices), to conduct monitoring activities, and to modify the SWPPP as necessary over time. We have formed a standing committee which participated in the preparation of this plan and will oversee its implementation. The committee will be lead by the MFA Oil Company Director of Environmental, Health & Safety and the facility manager.

1.3 Implementation Schedule

All of what are called "management BMPs" (those that do not involve any major construction) are to be implemented by the end of the 2006 calendar year.

1.4 Protocol on Public Access to the SWPPP

Although this is a Company plan, meant for the use by our employees, it is a public document. Representatives of the DNR who visit the Facility on occasion are allowed direct access to the plan when on site. Any request for a copy of the plan by the DNR, or other government agency is to be forwarded to the MFA Oil Company Director of Environmental, Health & Safety.

1.5 Updating the SWPPP

The DNR can require changes to the plan. We are not required to forward this plan automatically to the DNR but only upon request. We are required to change the plan whenever a change in our activities occurs that may affect significantly the discharge of pollutants. We may also change the plan if we determine that there are more economical BMPs to reduce pollutants than the one's currently identified in the SWPPP. The facility manager is responsible for determining if the SWPPP is to be changed, and when done, by the involvement of the Committee.

CHAPTER 2
SITE LOCATION AND GENERAL ENVIRONS

2.1 General Nature of Facility Activities

The facility's primary objective is the bulk storage of petroleum products in aboveground storage tanks. Loading and unloading of mobile containers frequently occurs. Minor spillage from transfers activities may occur. Various equipment and miscellaneous vehicles may be maintained on site. This includes engine maintenance, lubrication, frame welding, miscellaneous painting, and washing. Highway tractors (trucks) are not maintained on site.

2.2 Map of General Environs

Figure 2.0 of the SPCC shows the facility and the immediately surrounding area. All surface drainage for the facility is via sheet flow to the north towards either Post Oak Creek located 0.46-miles northeast of the Site or Devil's Branch located 0.18-miles to the northwest.

2.3 Maps of Facility Layout

The location of buildings and major activity areas are shown on Figure 2.0 of the SPCC. The areas of primary concern are the ASTs secondary containment structures and the bulk fuel loading and unloading areas.

Over-the-road transport tanks may be used to fill the ASTs via a pressurized system. Fuel may be unloaded from the ASTs to bulk fuel delivery trucks (bobtail trucks). Stormwater from the AST storage area may be collected in the secondary containment structure and discharged [see the accompanying Spill Prevention Control and Countermeasures (SPCC) Plan].

An office and warehouse are present. Packaged oil products (greases, lubricating oils, etc.) may be present, but are protected from exposure to storm water. However, this is a minor part of the operation. This area is not considered a significant source of pollutants and therefore is not discussed further in the SWPPP.

Bobtail trucks may be stored in the facility yard and minor repairs may be conducted.

2.4 Description of Storm Drainage System and Outfalls

The drainage pipes, outfalls, and the boundaries of the areas that drain to each outfall are shown on Figure 2.0 of the SPCC. Included in the drainage system is a secondary containment structure. This structure provides detention of stormwater in contact with the ASTs and prevents the immediate discharge of petroleum products if a spill were to occur. Please see the accompanying SPCC Plan for detailed information regarding the operation of the secondary containment structure.

CHAPTER 3
DESCRIPTION OF POTENTIAL SOURCES OF POLLUTION

The locations (as previously discussed) of various activities that could be sources of pollution are shown on Figure 2.0. Enclosed at the back of this report are various completed worksheets, including a summary of materials that could become contaminants.

3.1 Fueling Area

Potential sources of pollution are:

- spills from the fueling of vehicles and equipment;
- spills when fuel is delivered;

CHAPTER 4
POTENTIAL POLLUTANTS

4.1 Significant Materials that May Come in Contact with Storm Water

Virgin lubricating oils and refined fuels are significant materials that may come in contact with storm water at this facility. Essentially all of these materials are related to the bulk storage of refined oils fueling of vehicles, and maintenance

.

4.2 Spills of Significant Materials after April 17, 1994

It is required by the regulations that we list spills since the date indicated. There have been no such spills.

TABLE 1.
LIST OF POLLUTANTS WITH A REASONABLE POTENTIAL TO BE PRESENT IN STORM WATER IN SIGNIFICANT QUANTITIES

Oil and Grease
Petroleum hydrocarbons
Total suspended solids
Benzene
Toluene
Ethylbenzene
Xylene

CHAPTER 5
STEPS TO REDUCE POLLUTION – BOTH OLD AND NEW

The accompanying SPCC plan summarizes existing BMPs, for responding to spilled oils.

5.1 Assignments to Implement the BMPs

The department responsible for the various BMPs are shown in Table 2.

5.2 Fueling Area

Current BMPs: Minor spills are cleaned up promptly using spill absorbent materials of various types are stored in the office/warehouse.

• Oil contaminated materials (no free liquids) such as rags, pads, filters and absorbent materials may be placed in covered dumpsters. Containment drums will be obtained and marked for these materials.

5.3 Employee Training

Current BMPs: Employees receive training on spill cleanup and control, and safety measures as per the SPCC plan.

New BMPs: Current training procedures will be modified to include awareness about storm water pollution, and the relationship between our activities and potential pollutants. This will occur once per year. All new employees will be provided this information during their normal orientation training.

CHAPTER 6
MONITORING AND RECORD KEEPING

6.1 Checking on New BMP Implementation

An annual inspection is required which must be documented (see below and the Permit). This inspection will be carried out by the Bulk Plant manager or MFA Oil Environmental, Health and Safety Staff. Upon completion of the annual inspection the BMP Implementation Committee will meet to consider: how well the BMPs are working, progress with the more substantial BMPs, and changes to both
the BMPs and the SWPPP.

6.2 Record Keeping

Records of all storm water monitoring information, inspections and visual observations, certifications, corrective actions and follow-up activities, and copies of all reports will be keep and retained for a period of at least five years.

6.3 Comprehensive Site Compliance Evaluation

An evaluation report will be prepared annually to assist us in evaluating the need to revise this SWPPP. A review of all monitoring data collected (i.e. visual observation records, inspection records, sampling and analysis results), BMPs, significant materials used, activities, and spills that have occurred including their causes and possible solutions will be conducted in the preparation of the evaluation report. The SWPPP will be revised as appropriate based on the evaluation and the revisions will be implemented within 90 days of the evaluation.

CHAPTER 7
CERTIFICATIONS AND SIGNATURES

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted, is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

BY: Daniel Creek

TITLE EHS Coordinator

DATE

Attachment 2

SPCC Plan Review and Inspection Checklist

U.S. ENVIRONMENTAL PROTECTION AGENCY
SPCC FIELD INSPECTION AND PLAN REVIEW CHECKLIST

MFA Oil Bulk Plant & Petro Card, Warrensburg, MO

Overview of the Checklist

This checklist is designed to assist EPA inspectors in conducting a thorough and nationally consistent inspection of a facility's compliance with the Spill Prevention, Control, and Countermeasure (SPCC) rule at 40 CFR part 112. It is a required tool to help federal inspectors (or their contractors) record observations for the site inspection and review of the SPCC Plan. While the checklist is meant to be comprehensive, the inspector should always refer to the SPCC rule in its entirety, the SPCC Regional Inspector Guidance Document, and other relevant guidance for evaluating compliance. This checklist must be completed in order for an inspection to count toward an agency measure (i.e., OEM inspection measures or GPRA). The completed checklist and supporting documentation (i.e. photo logs or additional notes) serve as the inspection report.

This checklist addresses requirements for onshore facilities including Tier II Qualified Facilities (excluding facilities involved in oil drilling, production and workover activities) that meet the eligibility criteria set forth in §112.3(g)(2).

Qualified facilities must meet the rule requirements in §112.6 and other applicable sections specified in §112.6, except for deviations that provide environmental equivalence and secondary containment impracticability determinations as allowed under §112.6.

The checklist is organized according to the SPCC rule. Each item in the checklist identifies the relevant section and paragraph in 40 CFR part 112 where that requirement is stated.

- Sections 112.1 through 112.5 specify the applicability of the rule and requirements for the preparation, implementation, and amendment of SPCC Plans. For these sections, the checklist includes data fields to be completed, as well as several questions with "yes," "no" or "NA" answers.
- Section 112.6 includes requirements for qualified facilities. These provisions are addressed in Attachment D.
- Section 112.7 includes general requirements that apply to all facilities (unless otherwise excluded).
- Sections 112.8 and 112.12 specify requirements for spill prevention, control, and countermeasures for onshore facilities (excluding production facilities).

The inspector needs to evaluate whether the requirement is addressed adequately or inadequately in the SPCC Plan and whether it is implemented adequately in the field (either by field observation or record review). For the SPCC Plan and implementation in the field, if a requirement is addressed adequately, mark the "Yes" box in the appropriate column. If a requirement is not addressed adequately, mark the "No" box. If a requirement does not apply to the particular facility or the question asked is not appropriate for the facility, mark as "NA". Discrepancies or descriptions of inspector interpretation of "No" vs. "NA" may be documented in the comments box subsequent to each section. If a provision of the rule applies only to the SPCC Plan, the "Field" column is shaded.

Space is provided throughout the checklist to record comments. Additional space is available as Attachment E at the end of the checklist. Comments should remain factual and support the evaluation of compliance.

Attachments

- Attachment A is for recording information about containers and other locations at the facility that require secondary containment.
- Attachment B is a checklist for documentation of the tests and inspections the facility operator is required to keep with the SPCC Plan.
- Attachment C is a checklist for oil spill contingency plans following 40 CFR 109. Unless a facility has submitted a Facility Response Plan (FRP) under 40 CFR 112.20, a contingency plan following 40 CFR 109 is required if a facility determines that secondary containment is impracticable as provided in 40 CFR 112.7(d). The same requirement for an oil spill contingency plan applies to the owner or operator of a facility with qualified oil-filled operational equipment that chooses to implement alternative requirements instead of general secondary containment requirements as provided in 40 CFR 112.7(k).
- Attachment D is a checklist for Tier II Qualified Facilities.
- Attachment E is for recording additional comments or notes.
- Attachment F is for recording information about photos.

FACILITY INFORMATION

FACILITY NAME: MFA Oil Bulk Plant & Petro Card			
LATITUDE: 38.77518°	LONGITUDE: -95.7685°	GPS DATUM: WGS84	
Section/Township/Range: NE1/4, S22, T46N, R26W	FRS#/OIL DATABASE ID:	ICIS#:	
ADDRESS: 128 Northwest Highway 50			
CITY: Warrensburg	STATE: MO	ZIP: 64093	COUNTY: Johnson
MAILING ADDRESS (IF DIFFERENT FROM FACILITY ADDRESS – IF NOT, PRINT "SAME"): SAME			
CITY: N/A	STATE: N/A	ZIP: N/A	COUNTY: N/A
TELEPHONE: 660-747-8895	FACILITY CONTACT NAME/TITLE: Carla Mathes, Manager		
OWNER NAME: MFA Oil Company			
OWNER ADDRESS: One Ray Young Drive, P.O. Box 519			
CITY: Columbia	STATE: MO	ZIP: 65205	COUNTY: Boone
TELEPHONE: 573-876-0381	FAX:	EMAIL:	
FACILITY OPERATOR NAME (IF DIFFERENT FROM OWNER – IF NOT, PRINT "SAME"): SAME			
OPERATOR ADDRESS: N/A			
CITY: N/A	STATE: N/A	ZIP: N/A	COUNTY: N/A
TELEPHONE: N/A	OPERATOR CONTACT NAME/TITLE: N/A		
FACILITY TYPE: Bulk oil storage and sales			SIC CODE:
HOURS PER DAY FACILITY ATTENDED: Approx. 8, varies	TOTAL FACILITY CAPACITY: 72,210 gallons		
TYPE(S) OF OIL STORED: Diesel, gasoline, biodiesel, motor and lubricating oil			
LOCATED IN INDIAN COUNTRY? ☐ YES ☑ NO RESERVATION NAME: N/A			

INSPECTION/PLAN REVIEW INFORMATION

PLAN REVIEW DATE: April 26, 2016	REVIEWER NAME: Mindy Luetke	
INSPECTION DATE: May 10, 2016	TIME: 10:00 AM	ACTIVITY ID NO:
LEAD INSPECTOR: Paul Doherty		
OTHER INSPECTOR(S): Mindy Luetke, EPA	Melinda Luetke 5/31/2016	

INSPECTION ACKNOWLEDGMENT

I performed an SPCC inspection at the facility specified above.

INSPECTORS SIGNATURES:	DATE: 5/30/16
SUPERVISOR REVIEW/SIGNATURE:	DATE:

SPCC GENERAL APPLICABILITY—40 CFR 112.1

IS THE FACILITY REGULATED UNDER 40 CFR part 112?

The completely buried oil storage capacity is over 42,000 U.S. gallons, **OR** the aggregate aboveground oil storage capacity is over 1,320 U.S. gallons **AND** — ☑ Yes ☐ No

The facility is a non-transportation-related facility engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, using, or consuming oil and oil products, which due to its location could reasonably be expected to discharge oil into or upon the navigable waters of the United States — ☑ Yes ☐ No

AFFECTED WATERWAY(S): Surface drainage to Post Oak Creek	DISTANCE: < 1,500 feet to Post Oak Creek

FLOW PATH TO WATERWAY: Surface drainage via sheet flow north to Post Oak Creek

Note: The following storage capacity is not considered in determining applicability of SPCC requirements:

- *Equipment subject to the authority of the U.S. Department of Transportation, U.S. Department of the Interior, or Minerals Management Service, as defined in Memoranda of Understanding dated November 24, 1971, and November 8, 1993; Tank trucks that return to an otherwise regulated facility that contain only residual amounts of oil (EPA Policy letter)*
- *Completely buried tanks subject to all the technical requirements of 40 CFR part 280 or a state program approved under 40 CFR part 281;*
- *Underground oil storage tanks deferred under 40 CFR part 280 that supply emergency diesel generators at a nuclear power generation facility licensed by the Nuclear Regulatory Commission (NRC) and subject to any NRC provision regarding design and quality criteria, including but not limited to CFR part 50;*
- *Any facility or part thereof used exclusively for wastewater treatment (production, recovery or recycling of oil is not considered wastewater treatment); (This does not include other oil containers located at a wastewater treatment facility, such as generator tanks or transformers)*
- *Containers smaller than 55 U.S. gallons;*
- *Permanently closed containers (as defined in §112.2);*
- *Motive power containers(as defined in §112.2);*
- *Hot-mix asphalt or any hot-mix asphalt containers;*
- *Heating oil containers used solely at a single-family residence;*
- *Pesticide application equipment and related mix containers;*
- *Any milk and milk product container and associated piping and appurtenances; and*
- *Intra-facility gathering lines subject to the regulatory requirements of 49 CFR part 192 or 195.*

Does the facility have an SPCC Plan? ☑ Yes ☐ No

FACILITY RESPONSE PLAN (FRP) APPLICABILITY—40 CFR 112.20(f)

A non-transportation related onshore facility is required to prepare and implement an FRP as outlined in 40 CFR 112.20 if:

☐ The facility transfers oil over water to or from vessels and has a total oil storage capacity greater than or equal to 42,000 U.S. gallons, **OR**

☐ The facility has a total oil storage capacity of at least 1 million U.S. gallons, **AND** at least one of the following is true:

- ☐ The facility does not have secondary containment sufficiently large to contain the capacity of the largest aboveground tank plus sufficient freeboard for precipitation.
- ☐ The facility is located at a distance such that a discharge could cause injury to fish and wildlife and sensitive environments.
- ☐ The facility is located such that a discharge would shut down a public drinking water intake.
- ☐ The facility has had a reportable discharge greater than or equal to 10,000 U.S. gallons in the past 5 years.

Facility has FRP: ☐ Yes ☐ No ☑ NA	FRP Number: N/A

Facility has a completed and signed copy of Appendix C, Attachment C-II, Certification of the Applicability of the Substantial Harm Criteria." ☑ Yes ☐ No

Comments: The facility is a wholesale distributor and retail merchant of petroleum products. There are 7 aboveground storage tanks (ASTs) and approximately 22 drums with a total storage capacity in excess of 72,210 gallons. ASTs and drums are within secondary containment.

SPCC TIER II QUALIFIED FACILITY APPLICABILITY—40 CFR 112.3(g)(2)

The aggregate aboveground oil storage capacity is 10,000 U.S. gallons or less **AND** In the three years prior to the SPCC Plan self-certification date, or since becoming subject to the rule (if the facility has been in operation for less than three years), the facility has **NOT** had:	☐ Yes ☑ No
• A single discharge as described in §112.1(b) exceeding 1,000 U.S. gallons, OR	☐ Yes ☑ No
• Two discharges as described in §112.1(b) each exceeding 42 U.S. gallons within any twelve-month period	☐ Yes ☑ No

IF ***YES*** TO ALL OF THE ABOVE, THEN THE FACILITY IS A TIER II QUALIFIED FACILITY[1] SEE ATTACHMENT D FOR TIER II QUALIFIED FACILITY CHECKLIST		
REQUIREMENTS FOR PREPARATION AND IMPLEMENTATION OF A SPCC PLAN—40 CFR 112.3		
Date facility began operations: The date the facility began operations is unknown. Aerial photographs indicate the facility was in operation as far back as 1997.		
Date of initial SPCC Plan preparation: Unknown	Current Plan version (date/number): November 2011/ Revised November 2015	
112.3(a)	**For facilities (except farms), including mobile or portable facilities:** • In operation on or prior to November 10, 2011: Plan prepared and/or amended and fully implemented by **November 10, 2011** • Beginning operations after November 10, 2011, Plan prepared and fully implemented before beginning operations	☑ Yes ☐ No ☐ NA ☐ Yes ☐ No ☑ NA
	For farms (as defined in §112.2): • In operation on or prior to August 16, 2002: Plan maintained, amended and implemented by **May 10, 2013** • Beginning operations after August 16, 2002 through May 10, 2013: Plan prepared and fully implemented by **May 10, 2013** • Beginning operations after May 10, 2013: Plan prepared and fully implemented before beginning operations	☐ Yes ☐ No ☑ NA ☐ Yes ☐ No ☑ NA ☐ Yes ☐ No ☑ NA
112.3(d)	Plan is certified by a registered Professional Engineer (PE) and includes statements that the PE attests: • PE is familiar with the requirements of 40 CFR part 112 • PE or agent has visited and examined the facility • Plan is prepared in accordance with good engineering practice including consideration of applicable industry standards and the requirements of 40 CFR part 112 • Procedures for required inspections and testing have been established • Plan is adequate for the facility	☑ Yes ☐ No ☐ NA ☑ Yes ☐ No ☐ NA ☑ Yes ☐ No ☐ NA ☑ Yes ☐ No ☐ NA ☑ Yes ☐ No ☐ NA ☑ Yes ☐ No ☐ NA
PE Name: Duane Ottmar	License No.: E-24241	State: MO — Date of certification: November 10, 2011
112.3(e)(1)	Plan is available onsite if attended at least 4 hours per day. If facility is unattended, Plan is available at the nearest field office. *(Please note nearest field office contact information in comments section below.)*	☑ Yes ☐ No ☐ NA
Comments: The PE Certification statement appears to adequately address the above requirements.		
AMENDMENT OF SPCC PLAN BY REGIONAL ADMINISTRATOR (RA)—40 CFR 112.4		
112.4(a),(c)	Has the facility discharged more than 1,000 U.S. gallons of oil in a single reportable discharge or more than 42 U.S. gallons in each of two reportable discharges in any 12-month period?[2]	☐ Yes ☑ No
If **YES**	• Was information submitted to the RA as required in §112.4(a)?[3] • Was information submitted to the appropriate agency or agencies in charge of oil pollution control activities in the State in which the facility is located§112.4(c) • Date(s) and volume(s) of reportable discharges(s) under this section:	☐ Yes ☐ No ☑ NA ☐ Yes ☐ No ☑ NA
	• Were the discharges reported to the NRC[4]?	☐ Yes ☐ No
112.4(d),(e)	Have changes required by the RA been implemented in the Plan and/or facility?	☐ Yes ☐ No ☑ NA

[1] An owner/operator who self-certifies a Tier II SPCC Plan may include environmentally equivalent alternatives and/or secondary containment impracticability determinations when reviewed and certified by a PE.

[2] A reportable discharge is a discharge as described in §112.1(b)(see 40 CFR part 110). The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination.

[3] Triggering this threshold may disqualify the facility from meeting the Qualified Facility criteria if it occurred in the three years prior to self certification

[4] Inspector Note-Confirm any spills identified above were reported to NRC

AMENDMENT OF SPCC PLAN BY THE OWNER OR OPERATOR—40 CFR 112.5		
112.5(a)	Has there been a change at the facility that materially affects the potential for a discharge described in §112.1(b)?	☐ Yes ☑ No
If YES	• Was the Plan amended within six months of the change?	☐ Yes ☐ No
	• Were amendments implemented within six months of any Plan amendment?	☐ Yes ☐ No
112.5(b)	Review and evaluation of the Plan completed at least once every 5 years?	☑ Yes ☐ No ☐ NA
	Following Plan review, was Plan amended within six months to include more effective prevention and control technology that has been field-proven to significantly reduce the likelihood of a discharge described in §112.1(b)?	☐ Yes ☑ No ☐ NA
	Amendments implemented within six months of any Plan amendment?	☐ Yes ☐ No ☑ NA
	Five year Plan review and evaluation documented?	☑ Yes ☐ No ☐ NA
112.5(c)	Professional Engineer certification of any technical Plan amendments in accordance with all applicable requirements of §112.3(d) *[Except for self-certified Plans]*	☐ Yes ☐ No ☑ NA

Name:	License No.:	State:	Date of certification:

Reason for amendment: The SPCC Plan does not address any prior reportable discharges. During the on-site inspection, facility personnel confirmed that no reportable discharges have occurred at the facility. The Plan adequately addresses periodic SPCC review and amendments. The plan was revised in November 2015, but not recertified by a PE. During the inspection, facility personnel confirmed that the revisions were administrative rather than technical.

GENERAL SPCC REQUIREMENTS—40 CFR 112.7		PLAN	FIELD
Management approval at a level of authority to commit the necessary resources to fully implement the Plan[5]		☑ Yes ☐ No	
Plan follows sequence of the rule or is an equivalent Plan meeting all applicable rule requirements and includes a cross-reference of provisions		☑ Yes ☐ No ☐ NA	
If Plan calls for facilities, procedures, methods, or equipment not yet fully operational, details of their installation and start-up are discussed *(Note: Relevant for inspection evaluation and testing baselines.)*		☐ Yes ☐ No ☑ NA	
112.7(a)(2)	The Plan includes deviations from the requirements of §§112.7(g), (h)(2) and (3), and (i) and applicable subparts B and C of the rule, except the secondary containment requirements in §§112.7(c) and (h)(1), 112.8(c)(2),112.8(c)(11), 112.12(c)(2), and 112.12(c)(11)	☐ Yes ☑ No ☐ NA	
If YES	• The Plan states reasons for nonconformance	☐ Yes ☐ No ☑ NA	
	• Alternative measures described in detail and provide equivalent environmental protection *(Note: Inspector should document if the environmental equivalence is implemented in the field, in accordance with the Plan's description)*	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
Describe each deviation and reasons for nonconformance: N/A			
112.7(a)(3)	Plan describes physical layout of facility and includes a diagram[6] that identifies: • Location and contents of all regulated fixed oil storage containers • Storage areas where mobile or portable containers are located • Completely buried tanks otherwise exempt from the SPCC requirements (marked as "exempt") • Transfer stations • Connecting pipes, including intra-facility gathering lines that are otherwise exempt from the requirements of this part under §112.1(d)(11)	☑ Yes ☐ No	☑ Yes ☐ No
	Plan addresses each of the following:		
(i)	For each fixed container, type of oil and storage capacity (see Attachment A of this checklist). For mobile or portable containers, type of oil and storage capacity for each container or an estimate of the potential number of mobile or portable containers, the types of	☑ Yes ☐ No	☑ Yes ☐ No

[5] May be part of the Plan or demonstrated elsewhere.
[6] Note in comments any discrepancies between the facility diagram, the description of the physical layout of facility, and what is observed in the field

	oil, and anticipated storage capacities		
(ii)	Discharge prevention measures, including procedures for routine handling of products (loading, unloading, and facility transfers, etc.)	☑ Yes ☐ No	☑ Yes ☐ No
(iii)	Discharge or drainage controls, such as secondary containment around containers, and other structures, equipment, and procedures for the control of a discharge	☑ Yes ☐ No	☑ Yes ☐ No
(iv)	Countermeasures for discharge discovery, response, and cleanup (both facility's and contractor's resources)	☑ Yes ☐ No	☑ Yes ☐ No
(v)	Methods of disposal of recovered materials in accordance with applicable legal requirements	☑ Yes ☐ No	
(vi)	Contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors with an agreement for response, and all Federal, State, and local agencies who must be contacted in the case of a discharge as described in §112.1(b)	☑ Yes ☐ No	
112.7(a)(4)	*Does not apply if the facility has submitted an FRP under §112.20:* ☐ Yes ☑ No ☐ NA Plan includes information and procedures that enable a person reporting an oil discharge as described in §112.1(b) to relate information on the: • Exact address or location and phone number of the facility; • Date and time of the discharge; • Type of material discharged; • Estimates of the total quantity discharged; • Estimates of the quantity discharged as described in §112.1(b); • Source of the discharge; • Description of all affected media; • Cause of the discharge; • Damages or injuries caused by the discharge; • Actions being used to stop, remove, and mitigate the effects of the discharge; • Whether an evacuation may be needed; and • Names of individuals and/or organizations who have also been contacted.		
112.7(a)(5)	*Does not apply if the facility has submitted a FRP under §112.20:* Plan organized so that portions describing procedures to be used when a discharge occurs will be readily usable in an emergency	☑ Yes ☐ No ☐ NA	
112.7(b)	Plan includes a prediction of the direction, rate of flow, and total quantity of oil that could be discharged for each type of major equipment failure where experience indicates a reasonable potential for equipment failure	☑ Yes ☐ No ☐ NA	
Comments: Spill reporting procedures required by 40 CFR 112.7 (a)(4) are not well defined. The Plan does not address pertinent information to provide when spill notifications are made to the National Response Center. Other requirements are adequately addressed.			
112.7(c)	Appropriate containment and/or diversionary structures or equipment are provided to prevent a discharge as described in §112.1(b), except as provided in §112.7(k) of this section for certain qualified operational equipment. The entire containment system, including walls and floors, are capable of containing oil and are constructed to prevent escape of a discharge from the containment system before cleanup occurs. The method, design, and capacity for secondary containment address the typical failure mode and the most likely quantity of oil that would be discharged. See Attachment A of this checklist. For onshore facilities, one of the following or its equivalent: • Dikes, berms, or retaining walls sufficiently impervious to contain oil; • Curbing or drip pans; • Sumps and collection systems; • Culverting, gutters or other drainage systems; • Weirs, booms or other barriers; • Spill diversion pond; • Retention ponds; or • Sorbent materials.		
	Identify which of the following are present at the facility and if appropriate containment and/or diversionary structures or equipment are provided as described above:		
	☑ Bulk storage containers	☐ Yes ☑ No ☐ NA	☑ Yes ☐ No ☐ NA
	☑ Mobile/portable containers	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
	☐ Oil-filled operational equipment (as defined in 112.2)	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
	☐ Other oil-filled equipment (i.e., manufacturing equipment)	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
	☑ Piping and related appurtenances	☐ Yes ☑ No ☐ NA	☑ Yes ☐ No ☐ NA
	☐ Mobile refuelers or non-transportation-related tank cars	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA

	☑ Transfer areas, equipment and activities	☐ Yes ☑ No ☐ NA	☑ Yes ☐ No ☐ NA
	☐ Identify any other equipment or activities that are not listed above:	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
112.7(d)	Secondary containment for one (or more) of the following provisions is determined to be impracticable: ☐ General secondary containment §112.7(c) ☐ Bulk storage containers §§112.8(c)(2)/112.12(c)(2) ☐ Loading/unloading rack §112.7(h)(1) ☐ Mobile/portable containers §§112.8(c)(11)/ 112.12(c)(11)	☐ Yes ☑ No	
If YES	• The impracticability of secondary containment is clearly demonstrated and described in the Plan	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
	• For bulk storage containers,[7] periodic integrity testing of containers and integrity and leak testing of the associated valves and piping is conducted	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
	(Does not apply if the facility has submitted a FRP under §112.20): • Contingency Plan following the provisions of 40 CFR part 109 is provided (see Attachment C of this checklist) AND	☐ Yes ☐ No ☑ NA	
	• Written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA

Comments: The SPCC Plan does not make an impracticability claim. Sized, specific-secondary containment for the ASTs is provided via poured concrete containment dikes. However, the Plan does not address general secondary containment for undiked areas with a potential for a release (i.e., the dispenser pumps and aboveground piping outside containment). During the inspection, facility personnel indicated that absorbent materials were available in the warehouse with emergency response numbers and emergency shutoff switch located near the undiked areas. While these provisions satisfy the requirement, they need to be discussed in detail in the SPCC Plan as they specifically relate to the general secondary containment requirement. Additionally, drums in the warehouse are stored within secondary containment; however the SPCC plan does not address containment for the drums.

		PLAN	FIELD
112.7(e)	Inspections and tests conducted in accordance with written procedures	☑ Yes ☐ No	☑ Yes ☐ No
	Record of inspections or tests signed by supervisor or inspector	☑ Yes ☐ No	☑ Yes ☐ No
	Kept with Plan for at least 3 years (see Attachment B of this checklist)[8]	☑ Yes ☐ No	☑ Yes ☐ No
112.7(f)	Personnel, training, and oil discharge prevention procedures		
(1)	Training of oil-handling personnel in operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and contents of SPCC Plan	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
(2)	Person designated as accountable for discharge prevention at the facility and reports to facility management	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
(3)	Discharge prevention briefings conducted at least once a year for oil handling personnel to assure adequate understanding of the Plan. Briefings highlight and describe known discharges as described in §112.1(b) or failures, malfunctioning components, and any recently developed precautionary measures	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
112.7(g)	Plan describes how to: • Secure and control access to the oil handling, processing and storage areas; • Secure master flow and drain valves; • Prevent unauthorized access to starter controls on oil pumps; • Secure out-of-service and loading/unloading connections of oil pipelines; and • Address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges.	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA

[7] These additional requirements apply only to bulk storage containers, when an impracticability determination has been made by the PE

[8] Records of inspections and tests kept under usual and customary business practices will suffice

	of this checklist) is provided in Plan AND • Written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful is provided in Plan	☐ Yes ☐ No ☑ NA	
Comments: N/A			
ONSHORE FACILITIES (EXCLUDING PRODUCTION) 40 CFR 112.8/112.12		**PLAN**	**FIELD**
112.8(b)/ 112.12(b) Facility Drainage			
Diked Areas (1)	Drainage from diked storage areas is: • Restrained by valves, except where facility systems are designed to control such discharge, OR • Manually activated pumps or ejectors are used and the condition	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA

112.7(h)	Tank car and tank truck loading/unloading rack[9] is present at the facility *Loading/unloading rack* means a fixed structure (such as a platform, gangway) necessary for loading or unloading a tank truck or tank car, which is located at a facility subject to the requirements of this part. A loading/unloading rack includes a loading or unloading arm, and may include any combination of the following: piping assemblages, valves, pumps, shut-off devices, overfill sensors, or personnel safety devices.	☑ Yes ☐ No	
If YES (1)	Does loading/unloading rack drainage flow to catchment basin or treatment facility designed to handle discharges or use a quick drainage system?	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
	Containment system holds at least the maximum capacity of the largest single compartment of a tank car/truck loaded/unloaded at the facility	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
(2)	An interlocked warning light or physical barriers, warning signs, wheel chocks, or vehicle brake interlock system in the area adjacent to the loading or unloading rack to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
(3)	Lower-most drains and all outlets on tank cars/trucks inspected prior to filling/departure, and, if necessary ensure that they are tightened, adjusted, or replaced to prevent liquid discharge while in transit	☑ Yes ☐ No ☐ NA	☑ Yes ☐ No ☐ NA
Comments: A loading rack is present at the facility. The inspection program described in the Plan appears to adequately address the requirements for discharge procedures and load–in and load-out procedures.			
		PLAN	**FIELD**
112.7(i)	Brittle fracture evaluation of field-constructed aboveground containers is conducted after tank repair, alteration, reconstruction, or change in service that might affect the risk of a discharge or after a discharge/failure due to brittle fracture or other catastrophe, and appropriate action taken as necessary (applies to only field-constructed aboveground containers)	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
112.7(j)	Discussion of conformance with applicable more stringent State rules, regulations, and guidelines and other effective discharge prevention and containment procedures listed in 40 CFR part 112	☑ Yes ☐ No ☐ NA	
112.7(k)	Qualified oil-filled operational equipment is present at the facility[10] *Oil-filled operational equipment* means equipment that includes an oil storage container (or multiple containers) in which the oil is present solely to support the function of the apparatus or the device. Oil-filled operational equipment is not considered a bulk storage container, and does not include oil-filled manufacturing equipment (flow-through process). Examples of oil-filled operational equipment include, but are not limited to, hydraulic systems, lubricating systems (e.g., those for pumps, compressors and other rotating equipment, including pumpjack lubrication systems), gear boxes, machining coolant systems, heat transfer systems, transformers, circuit breakers, electrical switches, and other systems containing oil solely to enable the operation of the device.	☐ Yes ☑ No	
If YES	Check which apply: Secondary Containment provided in accordance with 112.7(c) ☐ Alternative measure described below (confirm eligibility) ☐		
112.7(k)	Qualified Oil-Filled Operational Equipment • Has a single reportable discharge as described in §112.1(b) from any oil-filled operational equipment exceeding 1,000 U.S. gallons occurred within the three years prior to Plan certification date?	☐ Yes ☐ No ☑ NA	
	• Have two reportable discharges as described in §112.1(b) from any oil-filled operational equipment each exceeding 42 U.S. gallons occurred within any 12-month period within the three years prior to Plan certification date?[11]	☐ Yes ☐ No ☑ NA	
	If YES for either, secondary containment in accordance with §112.7(c) is required		
	• Facility procedure for inspections or monitoring program to detect equipment failure and/or a discharge is established and documented	☐ Yes ☐ No ☑ NA	☐ Yes ☐ No ☑ NA
	Does not apply if the facility has submitted a FRP under §112.20:		
	• Contingency plan following 40 CFR part 109 (see Attachment C	☐ Yes ☐ No ☑ NA	

[9] Note that a tank car/truck loading/unloading rack must be present for §112.7(h) to apply

[10] This provision does not apply to oil-filled manufacturing equipment (flow-through process)

[11] Oil discharges that result from natural disasters, acts of war, or terrorism are not included in this determination. The gallon amount(s) specified (either 1,000 or 42) refers to the amount of oil that actually reaches navigable waters or adjoining shorelines not the total amount of oil spilled. The entire volume of the discharge is oil for this determination.

Attachment 3

Figures

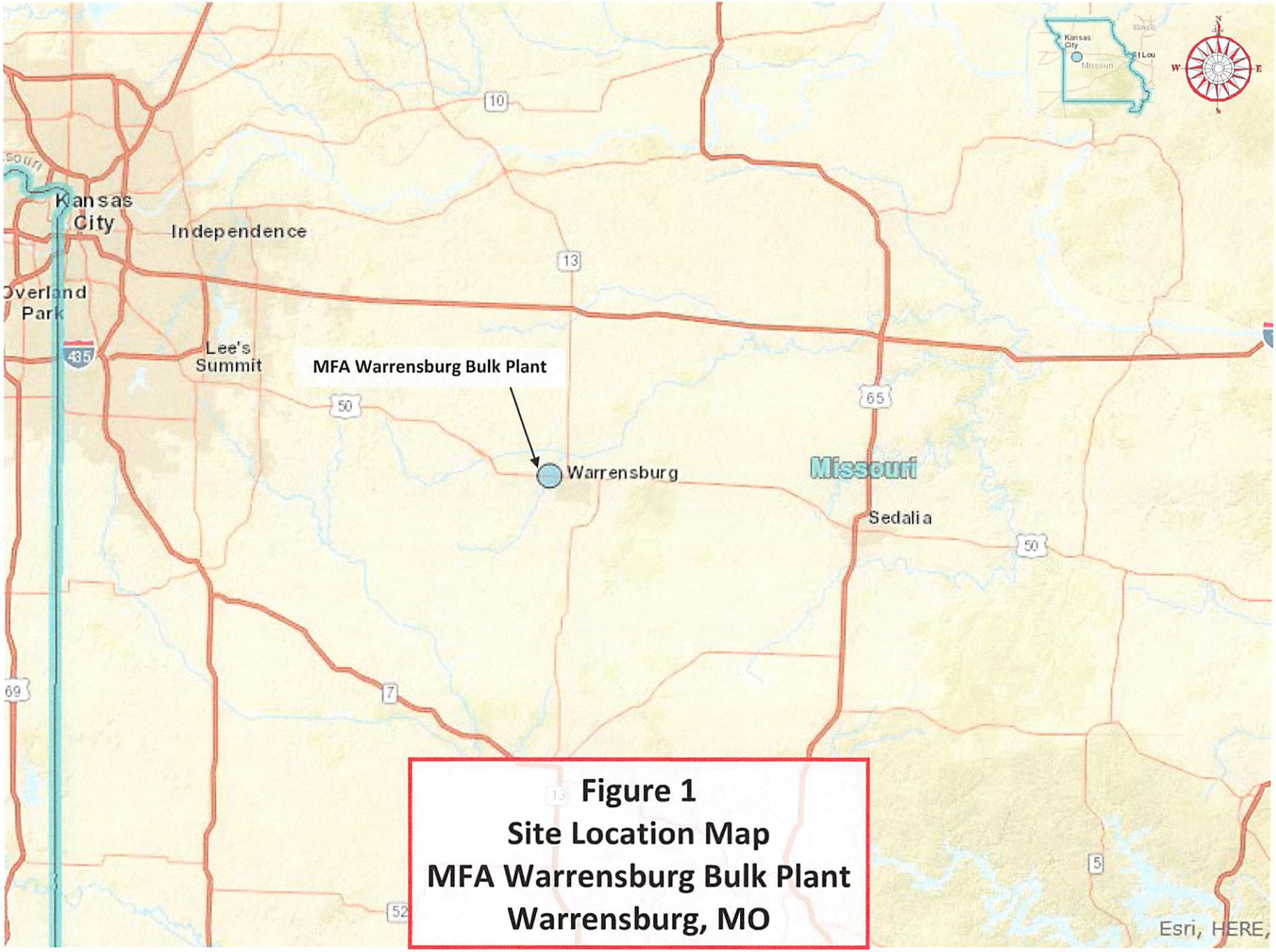


Figure 1
Site Location Map
MFA Warrensburg Bulk Plant
Warrensburg, MO

Figure 2
Aerial Photo
MFA Warrensburg Bulk Plant
Warrensburg, MO

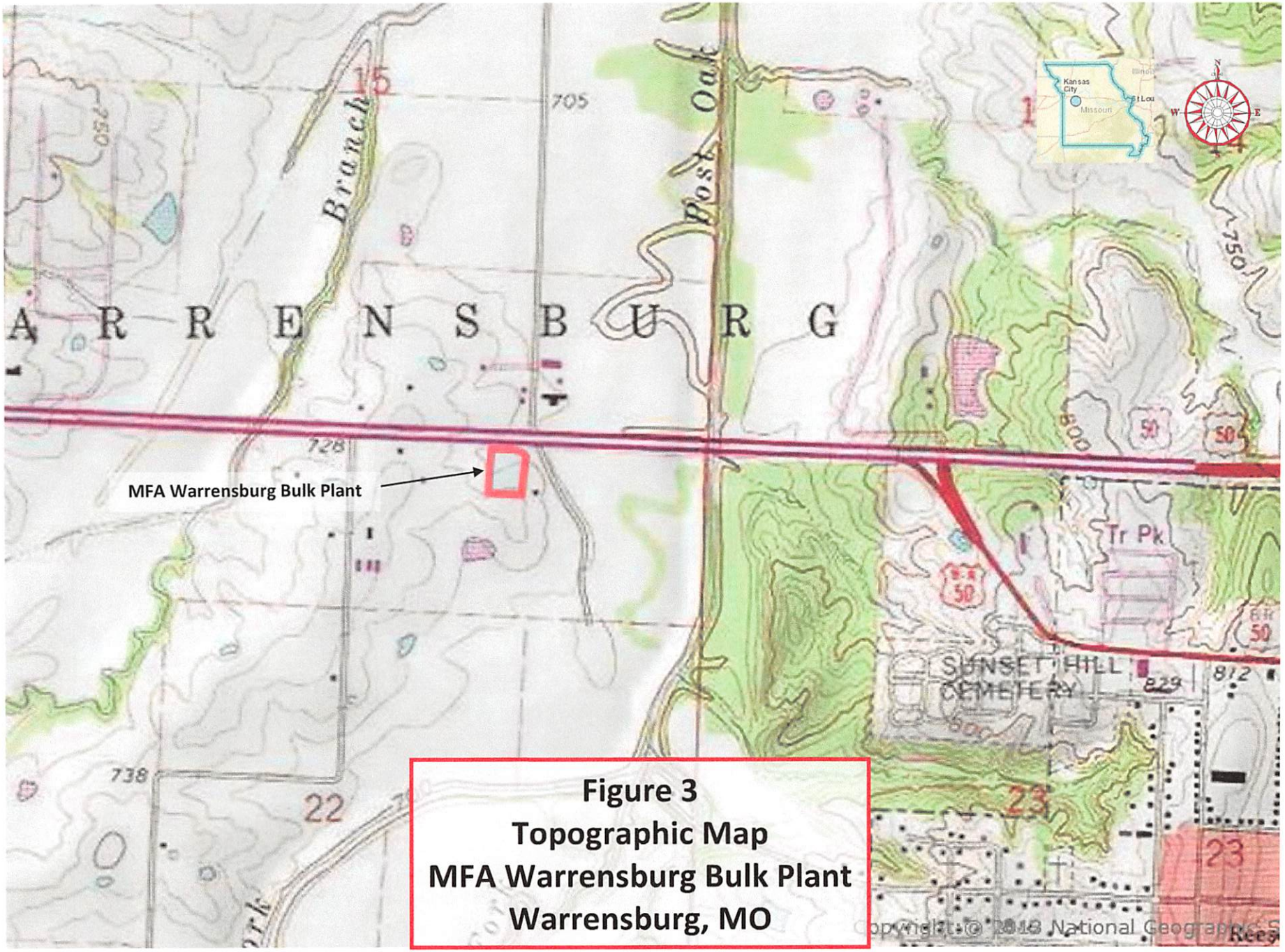


Figure 3
Topographic Map
MFA Warrensburg Bulk Plant
Warrensburg, MO

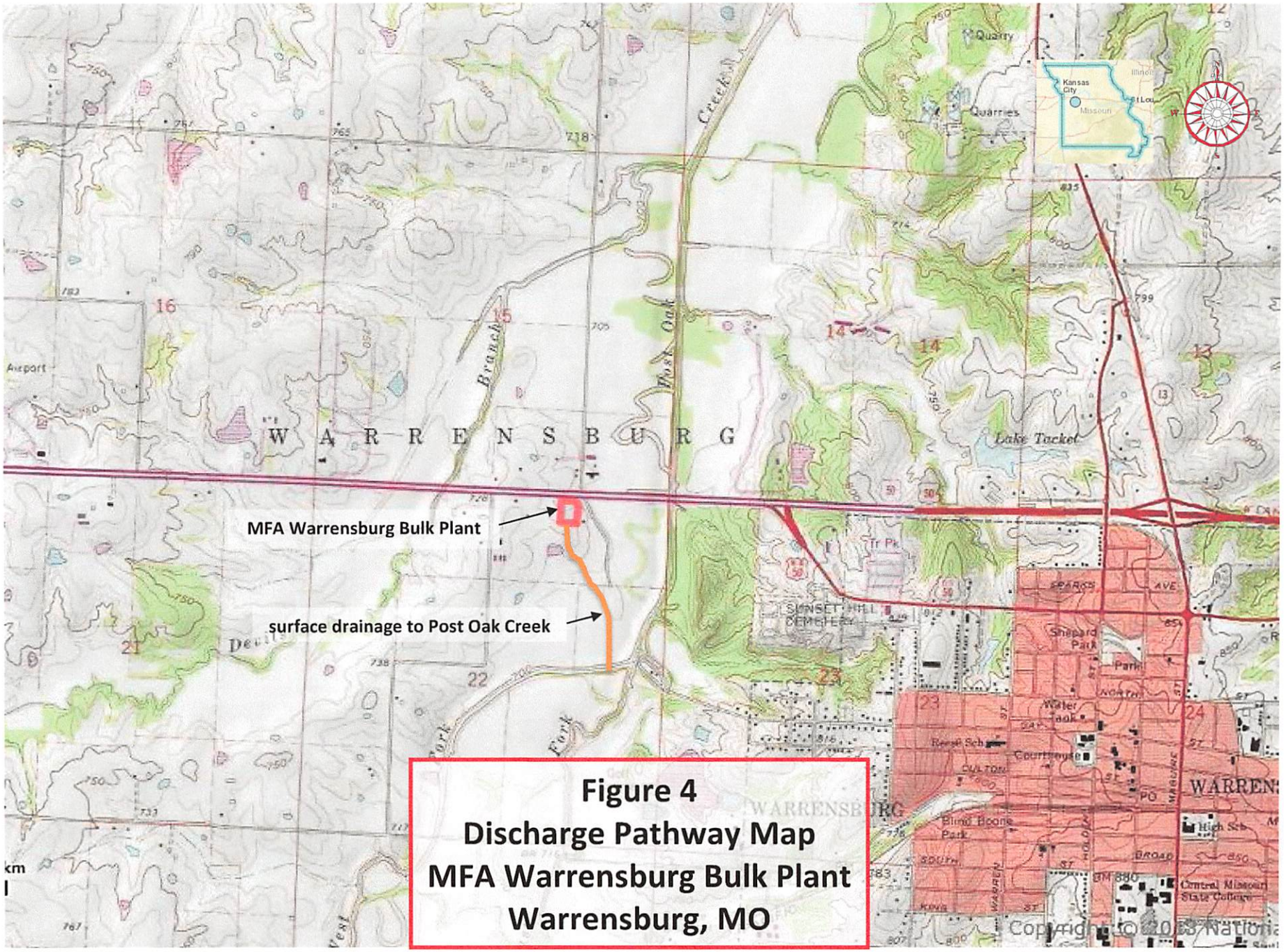


Figure 4
Discharge Pathway Map
MFA Warrensburg Bulk Plant
Warrensburg, MO

Attachment 4

Photos

Photo: # 1 Site: MFA Oil Bulk Plant & Petro Card, Warrensburg, MO Date: 5/10/2016
Time: AM Direction: Northeast Photographer: Paul Doherty, EPA Witness: Mindy Luetke, EPA
Description: View of MFA Oil Warrensburg facility sign.

Photo: # 2 Site: MFA Oil Bulk Plant & Petro Card, Warrensburg, MO Date: 5/10/2016
Time: AM Direction: Southwest Photographer: Paul Doherty, EPA Witness: Mindy Luetke, EPA
Description: Overview of the MFA Oil Warrensburg loading rack and tank battery.

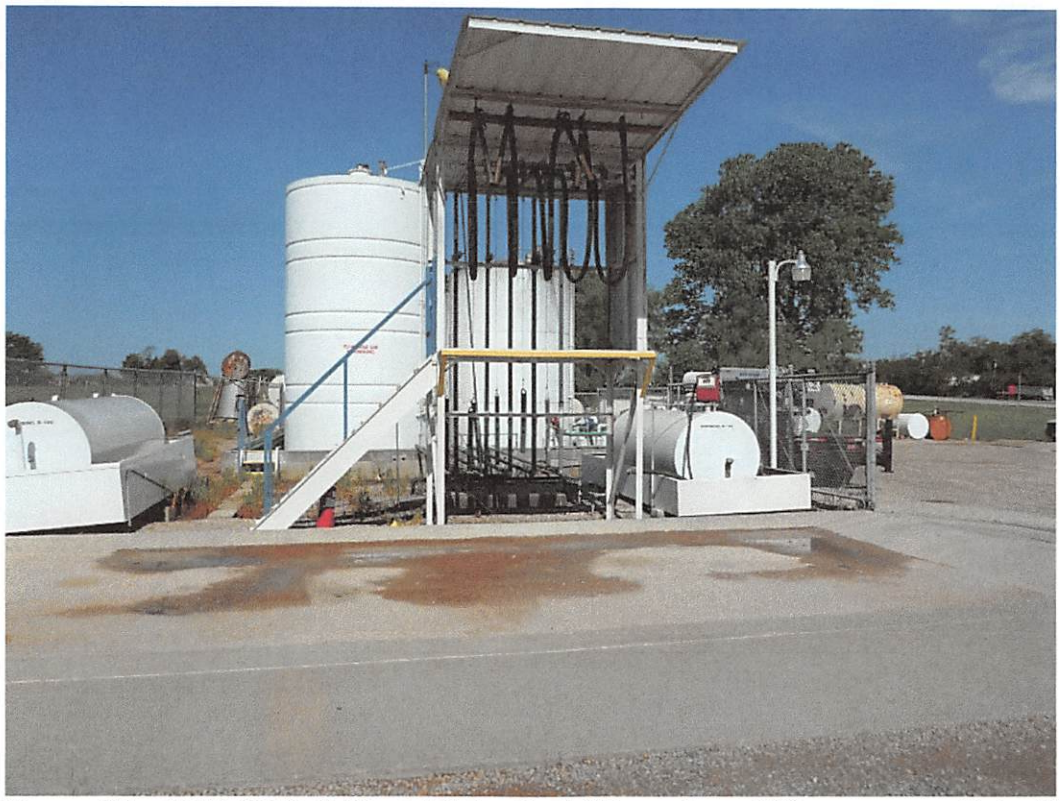


Photo: # 3 Site: MFA Oil Bulk Plant & Petro Card, Warrensburg, MO Date: 5/10/2016
Time: AM Direction: West Photographer: Paul Doherty, EPA Witness: Mindy Luetke, EPA
Description: Overview of the MFA Oil Warrensburg loading rack and tank battery.

Photo: # 4 Site: MFA Oil Bulk Plant & Petro Card, Warrensburg, MO Date: 5/10/2016
Time: AM Direction: West Photographer: Paul Doherty, EPA Witness: Mindy Luetke, EPA
Description: View of an empty biodiesel storage tank (Tank No. 9) located on site.

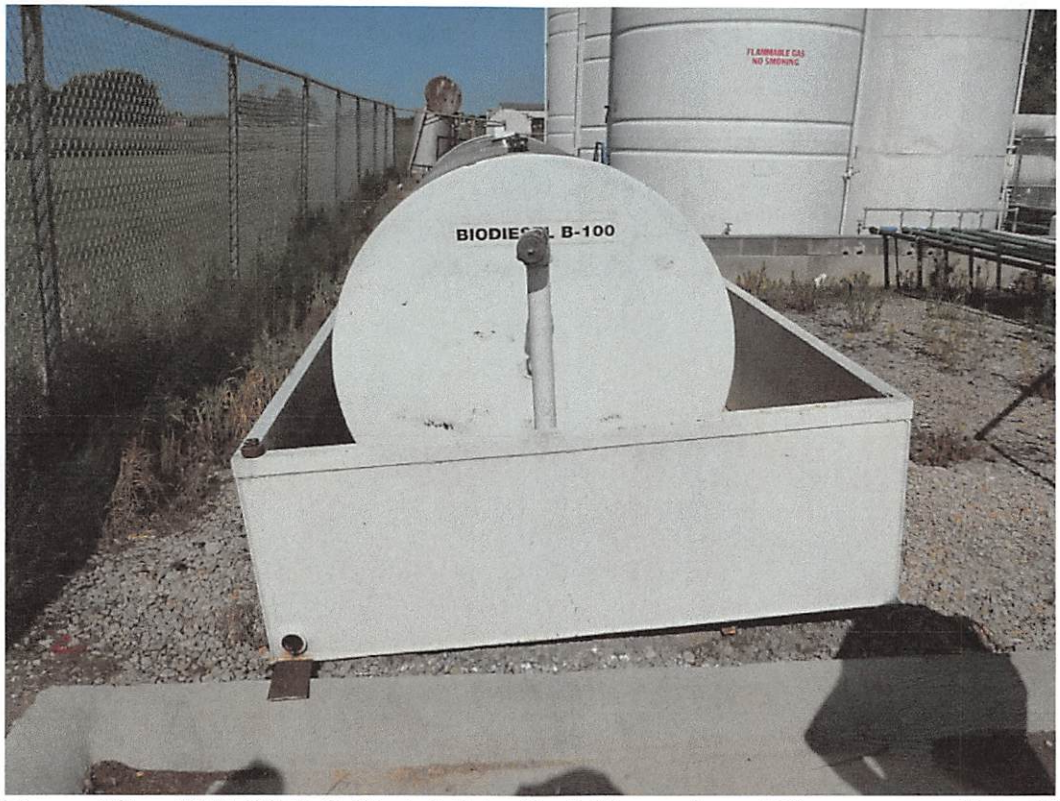


Photo: # 5 Site: MFA Oil Bulk Plant & Petro Card, Warrensburg, MO Date: 5/10/2016
Time: AM Direction: West Photographer: Paul Doherty, EPA Witness: Mindy Luetke, EPA
Description: View of an empty biodiesel storage tank (Tank No. 10) located on site.

Photo: # 6 Site: MFA Oil Bulk Plant & Petro Card, Warrensburg, MO Date: 5/10/2016
Time: AM Direction: Northwest Photographer: Paul Doherty, EPA Witness: Mindy Luetke, EPA
Description: View of aboveground product piping from the tank farm.

Photo: # 7 Site: MFA Oil Bulk Plant & Petro Card, Warrensburg, MO Date: 5/10/2016
Time: AM Direction: West Photographer: Paul Doherty, EPA Witness: Mindy Luetke, EPA
Description: View of the tank farm secondary containment area.

Photo: # 8 Site: MFA Oil Bulk Plant & Petro Card, Warrensburg, MO Date: 5/10/2016
Time: AM Direction: South Photographer: Paul Doherty, EPA Witness: Mindy Luetke, EPA
Description: View of fill port box equipped with high level automatic shut-off device and alarm system for the tanks within secondary containment (Tank Nos. 4, 5, 6, 7, and 8).

Photo: # 9 Site: MFA Oil Bulk Plant & Petro Card, Warrensburg, MO Date: 5/10/2016
Time: AM Direction: East Photographer: Paul Doherty, EPA Witness: Mindy Luetke, EPA
Description: View of valve for drainage of stormwater from the tank farm secondary containment area.

Photo: # 10 Site: MFA Oil Bulk Plant & Petro Card, Warrensburg, MO Date: 5/10/2016
Time: AM Direction: Northwest Photographer: Paul Doherty, EPA Witness: Mindy Luetke, EPA
Description: View of empty storage containers at the facility.

Photo: # 11 Site: MFA Oil Bulk Plant & Petro Card, Warrensburg, MO Date: 5/10/2016
Time: AM Direction: Northeast Photographer: Paul Doherty, EPA Witness: Mindy Luetke, EPA
Description: View of the MFA Oil Warrensburg canopy and dispensers.

Photo: # 12 Site: MFA Oil Bulk Plant & Petro Card, Warrensburg, MO Date: 5/10/2016
Time: AM Direction: South Photographer: Paul Doherty, EPA Witness: Mindy Luetke, EPA
Description: View of the MFA Oil Warrensburg office/warehouse building.

Photo: # 13 Site: MFA Oil Bulk Plant & Petro Card, Warrensburg, MO Date: 5/10/2016
Time: AM Direction: Southwest Photographer: Paul Doherty, EPA Witness: Mindy Luetke, EPA
Description: View of storage in the warehouse building, including containers of motor oil for retail sale.

Photo: # 14 Site: MFA Oil Bulk Plant & Petro Card, Warrensburg, MO Date: 5/10/2016
Time: AM Direction: Southeast Photographer: Paul Doherty, EPA Witness: Mindy Luetke, EPA
Description: View of the drum storage area in the warehouse building. The drums contain hydraulic oil for retail sale.

Photo: # 15 Site: MFA Oil Bulk Plant & Petro Card, Warrensburg, MO Date: 5/10/2016
Time: AM Direction: West Photographer: Paul Doherty, EPA Witness: Mindy Luetke, EPA
Description: View of facility sign depicting emergency contact phone numbers.

Attachment 5

Facility Contact Information

MFA OIL

MFA OIL COMPANY
P.O. Box 519
Columbia, MO 65205

Daniel Creek
Environmental, Health &
Safety Coordinator

Business	(573) 219-5785
Cell	(573) 823-5473
Fax	(573) 876-0438
E-mail	dcreek@mfaoil.com

MFA OIL

MFA OIL COMPANY
128 NW 50 Highway
Warrensburg, MO 64093

Larry Eggen
Manager

CERTIFIED ENERGY PRO

Business	(660) 747-8895
Fax	(660) 747-1757
Cell	(660) 909-7882
E-mail	leggen@mfaoil.com

Attachment 6

Facility Documentation

MFA OIL

Secondary Containment Drainage Report

Store Name Warrensburg BP Store # 0044

Store Manager ~~Carla Hatter~~ Kerry Eggen

Any discharge of water from a petroleum tank secondary containment or diked area can not have any sheen. There shall be no discharge of visible oil, floating solids or visible foam. If any of the proceeding is present, the water must be cleaned by use of absorbent pads and/or absorbent booms or other approved methods. When the water is clean, it may be drained using the following monitoring record. If the water can not be cleaned adequately, contact the Compliance and Safety Department at (573) 876-0458 **immediately**.

2015

Date	Time Valve Opened	Time Valve Closed	Employee Signature	Manager Initials	Type of Absorbent Material Used	Estimate of Gallons Removed
11/2/15	8:30	9:30				
11-16-15	12:00	1:10				
12/3/15	8:00	9:00				
12/14/15	8 00	10:00				
2/2/16	8:00	9:00	KEggen	KE		
3/9/16	8:30	9:30				
3-17-16	10:00	12:00				
4-19-16	8:30	9:30				
5-26-16	2:00	3:00				
5-2-16	3:30	4:15				
5-9-16	8:30	9:30				

A record of discharge from the containment area must be maintained in the store files for 3 years.

SPCC Monthly Aboveground ~ age Tank Inspection Report

Plant Name: Warrensburg Bulk Plant and Petro card **Physical Address: 128 NW 50 Hwy, Warrensburg, MO**

Keep a copy of this completed report with the SPCC Plan

Date / Time: April 1 2016 Weather Conditions: Clear

Inspector's Name: Larry Eggen Inspector's Signature: Larry Eggen

Next to the inspection items, write the letter Y or N to indicate whether any evidence of that inspection item exists. If the response is Y, then explain in the comment section. NA = Not Applicable

Inspection Item	Yes	No	Yes	No	Yes	No
Tank Containment	**Containment for Tanks 4 - 8**		**Containment for Tanks 9**		**Containment for Tanks 10**	
Water in secondary containment, interstice or spill container?		X		X		X
Debris or fire hazard in containment?		X		X		X
Drain valves operable and in a closed position?	X		X		X	
Containment egress pathways clear and gates/doors operable?	X		X		X	

Tank # & Product	**Tank 4: 12,000-gal Unleaded Gasoline**		**Tank 5: 12,000-gal Unleaded Gasoline**		**Tank 6: 15,000-gal #2 Clear Diesel**		**Tank 7: 15,000-gal #2 Red Diesel**		**Tank 8: 15,000-gal #2 Red Diesel**		**Tank 9: 1,000-gal. B99**		**Tank 10: 1,000-gal. B99**	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Leak Detection														
Visible signs of leakage around the tank, concrete pad, containment, ringwall, or ground?		X		X		X		X		X		X		X
Visible signs of leakage underneath fuel dispensers?		X		X		X		X		X		X		X
Tank Attachments and Appurtenances														
Ladder and platform structure secure with no sign of severe corrosion or damage?	X		X		X		X		X		X		X	
Tank Liquid level gauge readable and in good condition?	X		X		X		X		X		X			
Check all tank openings are properly sealed	X		X		X		X		X		X		X	
Other Conditions														
Are there other conditions that should be addressed for continued safe operation or that may affect the site SPCC plan?		X		X		X		X		X		X		X

Specific Observations/Comments

SPCC Annual Aboveground Storage Tank Inspection Report
MFA Warrensburg Bulk Plant and Petro-Card

Keep a copy of this completed report with the SPCC plan.

Date/Time: 1/3/16
Inspector's Name: Larry Eggeal

Weather Conditions: clear
Inspector's Signature: Larry Eggeal

Next to the inspection items, write the letter Y or N to indicate whether any evidence of that inspection item exists. If the response is Y, then explain in the comment section.
NA= Not Applicable

Inspection Item	Yes	No	Yes	No	Yes	No
	Containment for Tanks 4-9		Containment for Tank 9		Containment for Tank 10	
Tank Containment						
Containment structure in satisfactory condition?	✓		✓		✓	
Drainage pipes/valves fit for continued service?	✓		✓		✓	

	Tank 4: 12,000-gal. Unleaded Gasoline		Tank 5: 12,000-gal. No. 2 Dyed Diesel		Tank 6: 15,000-gal. No. 2 Red Diesel		Tank 7: 15,000-gal. No. 2 Red Diesel		Tank 8: 16,500-gal. No. 2 Clear Diesel		Tank 9: 1,000-gal. B-99		Tank 10: 1,000-gal. B-99	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Tank Foundation and Supports														
Evidence of tank settlement or foundation washout?		✓		✓		✓		✓		✓		✓		✓
Cracking or spalling of concrete pad or ring wall?		✓		✓		✓		✓		✓		✓		✓
Tank supports in satisfactory condition?	✓		✓		✓		✓		✓		✓		✓	
Water able to drain away from tank?	✓		✓		✓		✓		✓		✓		✓	
Grounding strap secured and in good condition?	✓		✓		✓		✓		✓		✓		✓	
Cathodic Protection (CP)														
CP System functional?														
Rectifier Reading:														
Tank External Coating														
Evidence of paint failure?		✓		✓		✓		✓		✓		✓		✓
Tank Shell/Heads														
Noticeable shell/head distortions, buckling, denting or bulging?		✓		✓		✓		✓		✓		✓		✓
Evidence of shell/head corrosion or cracking?		✓		✓		✓		✓		✓		✓		✓
Tank Manways, Piping and Equipment within Secondary Containment														
Flanged connection bolts tight and and fully engaged with no sign of water or corrosion?		✓		✓		✓		✓		✓		✓		✓

EMPLOYEE TRAINING AND BRIEFING ATTENDANCE RECORDS
MFA Warrensburg BP & PC

Keep this attendance record with the SPCC Plan

Instructor's Name	Date	Employee's Name	SPCC Training or Briefing?
DICK TUINSTRA	11-30-11	LARRY EGGEN	TRAINING
Larry Eggen	2-3-12	Byron Smart	Training
Larry Eggen	2-3-12	Nathan Deuschle	Training
Larry Eggen	2-3-12	Chad Kosmiski	Training
Larry EGGEN	2-6-12	Ronald Goodwin	Training
Larry Eggen	2-6-12	Steve Frazier	Training
Dan Crok	11-13-14	Larry Eggen	Briefing
Dan Crok	9/24/15	Byron Sinclair	Briefing

STI SPOO1 AST Record

11/7/11

OWNER INFORMATION	FACILITY INFORMATION	INSTALLER INFORMATION
Name: MFA Oil	Name: Warrensburg, MO	Name:
Number and Street: One Ray Young Drive	Number and Street: 129 NW 50 Hwy	Number and Street:
City, State, Zip Code: Columbia, MO 65205	City, State, Zip Code: Warrensburg, MO 64093	City, State, Zip Code:

TANK ID:	14	15	16
SPECIFICATIONS:			
Design:	☐ UL ☐ SWRI ☐ API ☐ Other ☐ Unknown ☐ Horizontal ☒ Vertical ☐ Rectangular	☐ UL ☐ SWRI ☐ API ☐ Other ☐ Unknown ☐ Horizontal ☒ Vertical ☐ Rectangular	☐ UL ☐ SWRI ☐ API ☐ Other ☐ Unknown ☐ Horizontal ☒ Vertical ☐ Rectangular
Manufacturer:			
Contents:	Unleaded	Super	#2 Clr DSL
Construction Date:			
Last Repair/Reconstruction Date:			New Bottom - 09/2011
Dimensions:	H- 17' D- 11'	H-17' D-11'	H-21' D-11'
Capacity, gallons:	12,000	12,000	15,000
Last Change of Service Date:	☐		
Construction:	☐ Bare Steel ☒ Painted Steel ☐ Cathodically Protected (Check one:) A. ☐ Galvanic, or B. ☐ Impressed Current Date Installed:	☐ Bare Steel ☒ Painted Steel ☐ Cathodically Protected (Check one:) A. ☐ Galvanic, or B. ☐ Impressed Current Date Installed:	☐ Bare Steel ☒ Painted Steel ☐ Cathodically Protected (Check one:) A. ☐ Galvanic, or B. ☐ Impressed Current Date Installed:
Containment:	☐ Earth Dike ☐ Steel Dike ☒ Concrete ☒ Synthetic Liner ☐ Other	☐ Earth Dike ☐ Steel Dike ☒ Concrete ☒ Synthetic Liner ☐ Other	☐ Earth Dike ☐ Steel Dike ☒ Concrete ☒ Synthetic Liner ☐ Other
CRDM:	Date Installed: Type:	Date Installed: Type:	Date Installed: Type:
Release Prevention Barrier:	☐ Yes ☐ No Date Installed: Type:	☐ Yes ☐ No Date Installed: Type:	☐ Yes ☐ No Date Installed: Type:

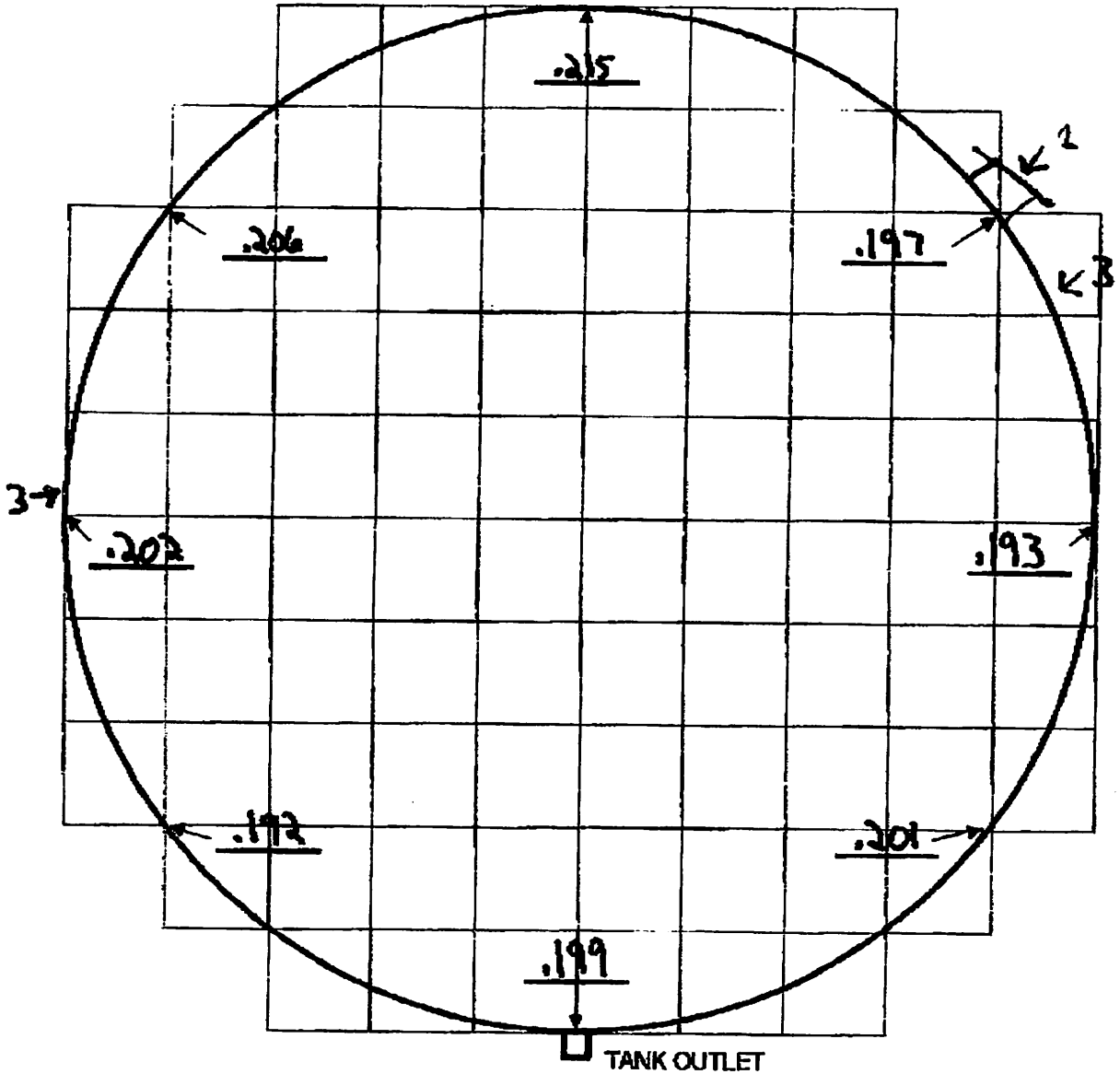
TANK ID:	#7	#8	#N/A
	SPECIFICATIONS:		
Design:	☐ UL ☐ SWRI ☐ API ☐ Other ☐ Unknown ☐ Horizontal ☒ Vertical ☐ Rectangular	☐ UL ☐ SWRI ☐ API ☐ Other ☐ Unknown ☐ Horizontal ☒ Vertical ☐ Rectangular	☐ UL ☐ SWRI ☐ API ☐ Other ☐ Unknown ☐ Horizontal ☐ Vertical ☐ Rectangular
Manufacturer:			
Contents:	Red Dsl	Red Dsl	
Construction Date:			
Last Repair/Reconstruction Date:		New Bottom 09/2011	
Dimensions:	H-21' D-11'	H-21' D-11'	
Capacity, gallons:	15,000	15,000	
Last Change of Service Date:			
Construction:	☐ Bare Steel ☒ Painted Steel ☐ Cathodically Protected (Check one:) A. ☐ Galvanic, or B. ☐ Impressed Current Date Installed:	☐ Bare Steel ☒ Painted Steel ☐ Cathodically Protected (Check one:) A. ☐ Galvanic, or B. ☐ Impressed Current Date Installed:	☐ Bare Steel ☐ Painted Steel ☐ Cathodically Protected (Check one:) A. ☐ Galvanic, or B. ☐ Impressed Current Date Installed:
Containment:	☐ Earth Dike ☐ Steel Dike ☒ Concrete ☒ Synthetic Liner ☐ Other	☐ Earth Dike ☐ Steel Dike ☒ Concrete ☒ Synthetic Liner ☐ Other	☐ Earth Dike ☐ Steel Dike ☐ Concrete ☐ Synthetic Liner ☐ Other
CRDM:	☐ Date Installed: Type:	☐ Date Installed: Type:	☐ Date Installed: Type:
Release Prevention Barrier:	☐ Yes ☐ No Date Installed: Type:	☐ Yes ☐ No Date Installed: Type:	☐ Yes ☐ No Date Installed: Type:

Item	Status	Comments
1.0 Tank Containment		
1.1 Containment structure in satisfactory condition?	☒Yes ☐No*	
1.2 Drainage pipes/valves fit for continued service	☒Yes ☐No* ☐ N/A	
2.0 Tank Foundation and Supports		
2.1 Evidence of tank settlement or foundation washout?	☐Yes* ☒No	
2.2 Cracking or spalling of concrete pad or ring wall?	☐Yes* ☒No	
2.3 Tank supports in satisfactory condition?	☒Yes ☐No*	
2.4 Water able to drain away from tank?	☒Yes ☐No*	
2.5 Grounding strap secured and in good condition?	☐Yes ☐No*	
3.0 Cathodic Protection		
3.1 CP system functional?	☐Yes ☐No* ☐n/a	
3.2 Rectifier Reading:		
4.0 Tank External Coating		
4.1 Evidence of paint failure?	☐Yes* ☒No	
5.0 Tank Shell/Heads		
5.1 Noticeable shell/head distortions, buckling, denting or bulging?	☐Yes* ☒No	
5.2 Evidence of shell/head corrosion or cracking?	☐Yes* ☒No	
6.0 Tank Manways, Piping and Equipment within Secondary Containment		
6.1 Flanged connection bolts tight and fully engaged with no sign of wear or corrosion?	☒Yes ☐No*	
7.0 Tank Roof		
7.1 Standing water on roof?	☐Yes* ☐No	
7.2 Evidence of coating cracking, crazing, peeling, blistering?	☐Yes* ☐No	
7.3 Holes in roof?	☐Yes* ☐No	

Item	Status		Comments
8.0 Venting			
8.1 Vents free of obstructions?	☐Yes	☐No*	
8.2 Emergency vent operable? Lift as required?	☐Yes	☐No*	
9.0 Insulated Tanks			
9.1 Insulation missing?	☐Yes*	☐No	
9.2 Are there noticable areas of moisture on the insulation?	☐Yes*	☐No	
9.3 Mold on insulation?	☐Yes*	☐No	
9.4 Insulation exhibiting damage?	☐Yes*	☐No	
9.5 Is the insulation sufficiently protected from water intrusion?	☐Yes	☐No*	
10.0 Level and Overfill Prevention Instrumentation of Shop-Fabricated Tanks			
10.1 Has the tank liquid level sensing device been tested to ensure proper operation?	☒Yes	☐No*	
10.2 Does the tank liquid level sensing device operate as required?	☒Yes	☐No*	
10.3 Are overfill prevention devices in proper working condition?	☒Yes ☐N/A	☐No*	
11.0 Electrical Equipment			
11.1 Are tank grounding lines in good condition?	☐Yes ☐N/A	☐No*	
11.2 Is electrical wiring for control boxes/lights in good condition?	☐Yes ☐N/A	☐No*	

Additional Comments:

Ultrasonic Thickness Test Inspection Report Page 1 of 2



Take 8 Readings 45 degrees apart

Utilize this form for Formal Internal & Formal External Inspections

Date	
Company	
Location	Warrensburg
Tank #	4
Product	Naled
Diameter	11'
Height	17'
Capacity	12,000
Manufacturer	Unknown
Construction	Welded

Locate All Openings on Tank
1 Manway
2 Ground Lug
3 Drain Valve
4 Gauge
5 Vents

Suitability for Continued Use:	
☐ No ☐ Yes	**Category 2 ASTs:** The AST shall be repaired or replaced if more than 3 square inches of any one square foot of the tank shell is found to be less than 75% of the original shell thickness or if the remaining shell thickness of an area is less than 50% of the original shell thickness at any point.
☐ No ☐ Yes	**Category 1 ASTs:** The AST shall be repaired or replaced if more than 3 square inches of any one square foot of the tank shell is found to be less than 50% of the original shell thickness or if the remaining shell thickness of an area is less than 25% of the original shell thickness at any point.

*Refer to STI SP031 Standard for Repair of In-Service Shop Fabricated ASTs for Storage of Combustible and Flammable Liquids.

Date _____

Company _____

Location Vernasburg

Tank # 4

Product Naked

Diameter 11'

Height 17'

Capacity 12,000

Manufaturer Unknown

Construction Welded

Notes: _____

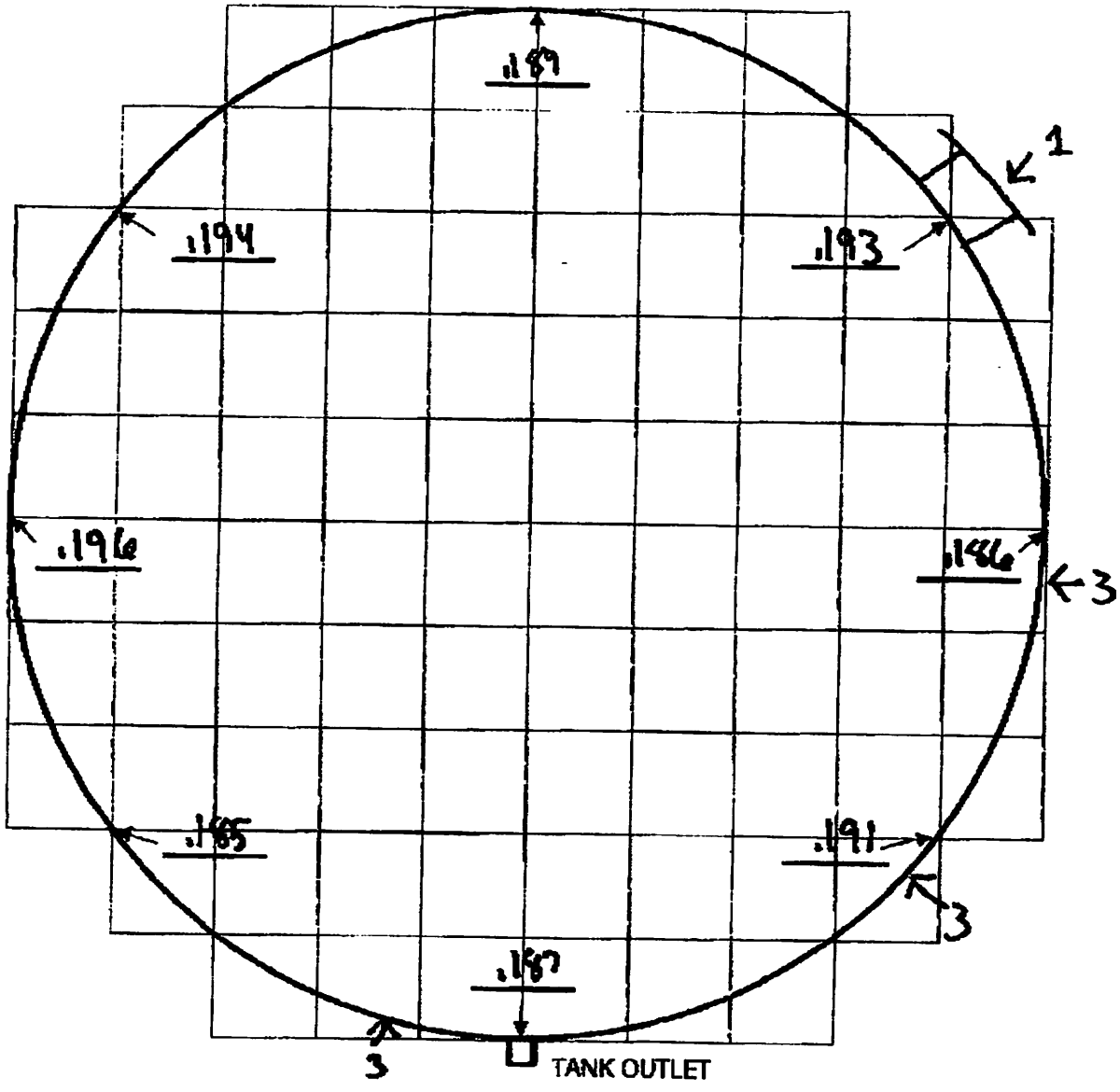
Repairs Made: _____

Inspector _____

Signature _____

Date _____

Ultrasonic Thickness Test Inspection Report Page 1 of 2



Take 8 Readings 45 degrees apart

Utilize this form for Formal Internal & Formal External Inspections

Date _____

Company _____

Location Warrenton

Tank # 5

Product Super

Diameter 11'

Height 17'

Capacity 12,000

Manufacturer Unknown

Construction Welded

Locate All Openings on Tank
1 Manway
2 Ground Lug
3 Drain Valve
4 Gauge
5 Vents

Suitability for Continued Use:	
☐ No ☐ Yes	**Category 2 ASTs:** The AST shall be repaired or replaced if more than 3 square inches of any one square foot of the tank shell is found to be less than 75% of the original shell thickness or if the remaining shell thickness of an area is less than 50% of the original shell thickness at any point.
☐ No ☐ Yes	**Category 1 ASTs:** The AST shall be repaired or replaced if more than 3 square inches of any one square foot of the tank shell is found to be less than 50% of the original shell thickness or if the remaining shell thickness of an area is less than 25% of the original shell thickness at any point.

*Refer to STI SP031 Standard for Repair of In-Service Shop Fabricated ASTs for Storage of Combustible and Flammable Liquids.

Notes:

Repairs Made:

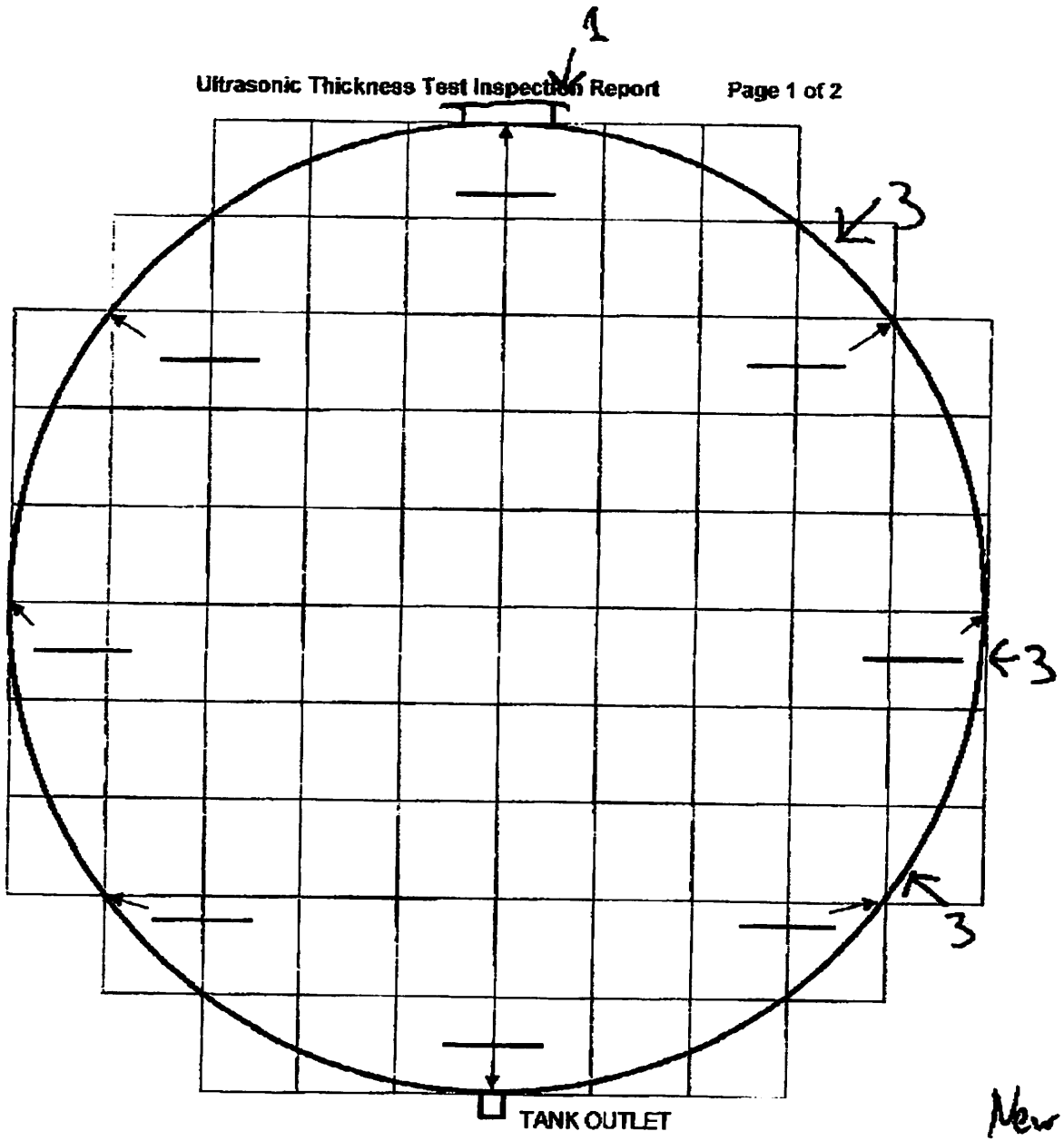
Date
Company
Location Warrensburg
Tank # 5
Product Super
Diameter 11'
Height 17'
Capacity 12,000
Manufaturer Unknown
Construction Welded

Inspector

Signature

Date

Ultrasonic Thickness Test Inspection Report



Take 8 Readings 45 degrees apart

Utilize this form for Formal Internal & Formal External Inspections

Date _____

Company _____

Location Warrensburg

Tank # 6

Product #2 Ult Dsl

Diameter 11'

Height 21'

Capacity 15,000

Manufacturer Unknown

Construction Welded

Locate All Openings on Tank
1 Manway
2 Ground Lug
3 Drain Valve
4 Gauge
5 Vents

New Tank Bottom
09/2011

Suitability for Continued Use:	
☐ No ☐ Yes	**Category 2 ASTs:** The AST shall be repaired or replaced if more than 3 square inches of any one square foot of the tank shell is found to be less than 75% of the original shell thickness or if the remaining shell thickness of an area is less than 50% of the original shell thickness at any point.
☐ No ☐ Yes	**Category 1 ASTs:** The AST shall be repaired or replaced if more than 3 square inches of any one square foot of the tank shell is found to be less than 50% of the original shell thickness or if the remaining shell thickness of an area is less than 25% of the original shell thickness at any point.

*Refer to STI SP031 Standard for Repair of In-Service Shop Fabricated ASTs for Storage of Combustible and Flammable Liquids.

Date _____

Company _____

Location Warrensburg

Tank # 6a

Product #2 Clr Dsl

Diameter 11'

Height 21'

Capacity 15,000

Manufaturer Unknown

Construction Welded

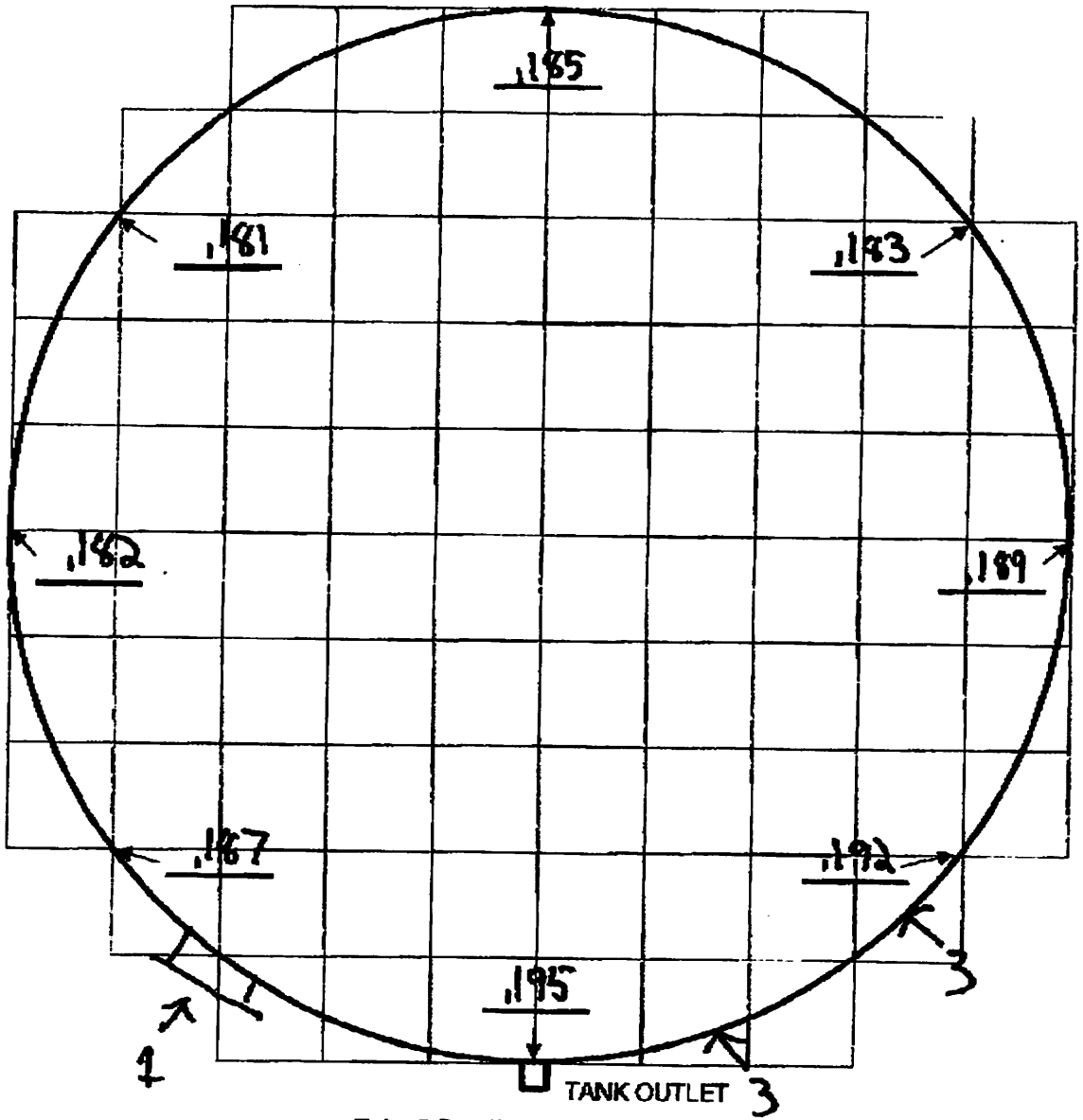
Notes: _____

Repairs Made: _____

Inspector _____

Signature _____

Date _____



Take 8 Readings 45 degrees apart

Utilize this form for Formal Internal & Formal External Inspections

Date _____

Company _____

Location Uhrichsburg

Tank # 7

Product Red Dsl

Diameter 11'

Height 21'

Capacity 15,000

Manufacturer Unknown

Construction Welded

Locate All Openings on Tank
1 Manway
2 Ground Lug
3 Drain Valve
4 Gauge
5 Vents

Suitability for Continued Use:	
☐No ☐Yes	**Category 2 ASTs:** The AST shall be repaired or replaced if more than 3 square inches of any one square foot of the tank shell is found to be less than 75% of the original shell thickness or if the remaining shell thickness of an area is less than 50% of the original shell thickness at any point.
☐No ☐Yes	**Category 1 ASTs:** The AST shall be repaired or replaced if more than 3 square inches of any one square foot of the tank shell is found to be less than 50% of the original shell thickness or if the remaining shell thickness of an area is less than 25% of the original shell thickness at any point.

*Refer to STI SP031 Standard for Repair of In-Service Shop Fabricated ASTs for Storage of Combustible and Flammable Liquids.

Date _____

Company _____

Location Warrensburg

Tank # 7

Product Red Dyl

Diameter 11'

Height 21'

Capacity 15,000

Manufaturer Unknown

Construction Welded

Notes: _____

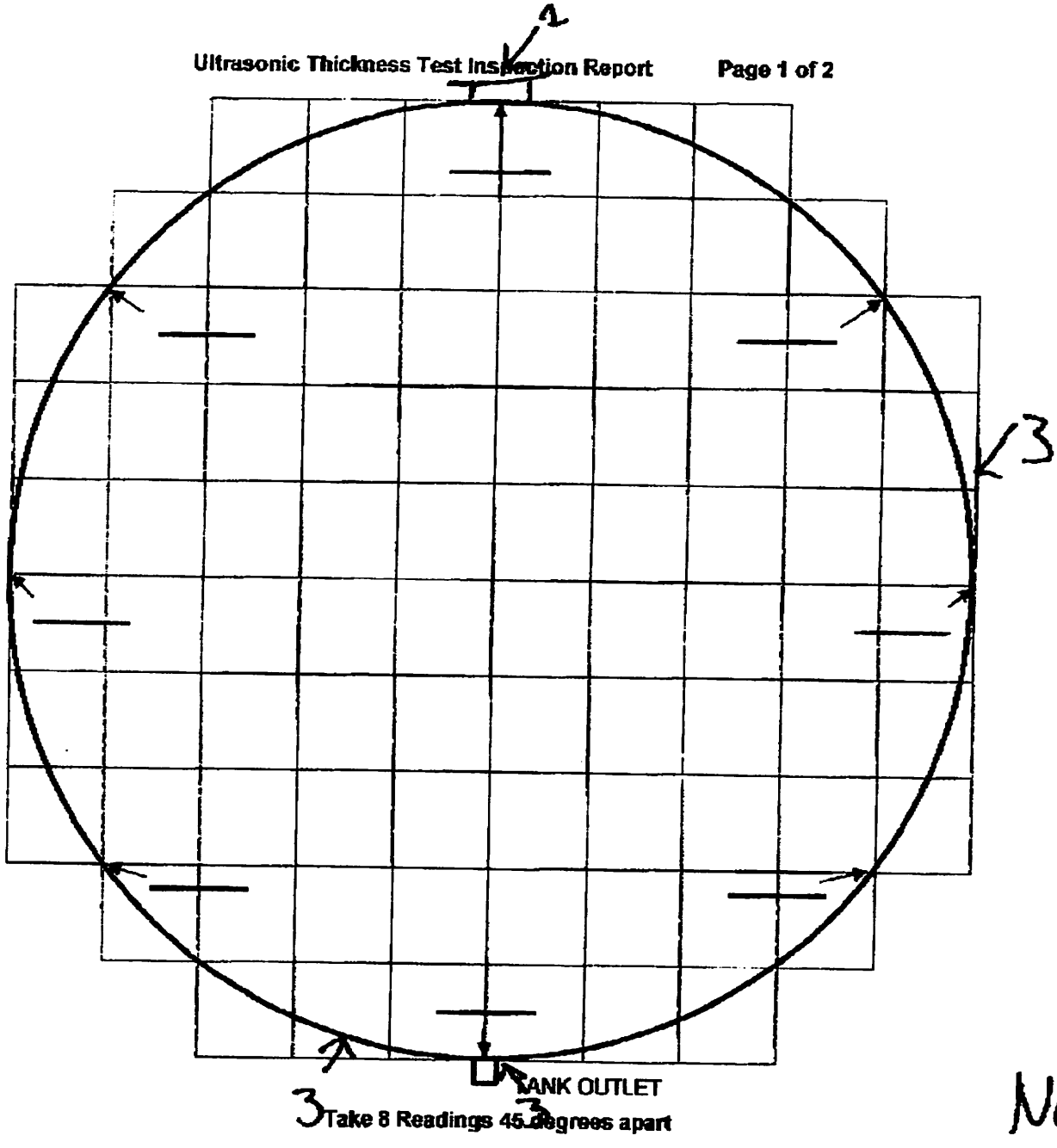
Repairs Made: _____

Inspector _____

Signature _____

Date _____

Ultrasonic Thickness Test Inspection Report



Utilize this form for Formal Internal & Formal External Inspections

Date _____

Company _____

Location Warrensburg

Tank # 4

Product Red Dsl

Diameter 11'

Height 21'

Capacity 15,000

Manufacturer Unknown

Construction Welded

Locate All Openings on Tank
1 Manway
2 Ground Lug
3 Drain Valve
4 Gauge
5 Vents

New Tank Bottom
09/2011

Suitability for Continued Use:	
☐ No ☐ Yes	**Category 2 ASTs:** The AST shall be repaired or replaced if more than 3 square inches of any one square foot of the tank shell is found to be less than 75% of the original shell thickness or if the remaining shell thickness of an area is less than 50% of the original shell thickness at any point.
☐ No ☐ Yes	**Category 1 ASTs:** The AST shall be repaired or replaced if more than 3 square inches of any one square foot of the tank shell is found to be less than 50% of the original shell thickness or if the remaining shell thickness of an area is less than 25% of the original shell thickness at any point.

*Refer to STI SP031 Standard for Repair of In-Service Shop Fabricated ASTs for Storage of Combustible and Flammable Liquids.

Date _____

Company _____

Location Warrensburg

Tank # 6

Product Red Dsl

Diameter 11'

Height 21'

Capacity 15,000

Manufacturer Unknown

Construction Welded

Notes: _____

Repairs Made: _____

Inspector _____

Signature _____

Date _____

CERTIFIED REPAIR SERVICE, LLC

30567 MARIGOLD RD.
SEDALIA, MO 65301
USA

Voice: 660-826-4811
Fax: 660-826-2843

INVOICE

Invoice Number: 14260
Invoice Date: Sep 28, 2011
Page: 1
Duplicate

Bill To:	Ship to:
MFA OIL COMPANY 2412 PARIS RD. P.O. BOX 519 COLUMBIA, MO 65201 USA	MFA OIL COMPANY 128 NW HWY 50 WARRENSBURG, MO 64093 USA

Customer ID	Customer PO	Payment Terms	
MFA	JOHN FRIEDRICH	DUE UPON RECIEPT	
Sales Rep ID	**Shipping Method**	**Ship Date**	**Due Date**
		9/6/11	9/28/11

Quantity	Item	Description	Unit Price	Amount
6.00	TNKCLN	LABOR TO CLEAN TANK	750.00	4,500.00
5.00	TNKINSP	LABOR TO INSPECT TANK	250.00	1,250.00
5.00	55GALDOTBARL	55 GAL. DOT BARREL	65.00	325.00
11.00	TNKBTMVRT	LABOR TO INSTALL TANK BOTTOM (1-11')	200.00	2,200.00
2.00	TNKWRKLIFTNGEY	LABOR TO INSTALL LIFTING EYES	200.00	400.00
6.00	TAMP	TAMP	60.00	360.00
2.00	20MNY	20" MANWAY COMPLETE	309.63	619.26
2.00	GSKTMAT	GASKET MATERIAL 1'X3'	41.07	82.14
1.00	18MNWYGSKT	18" MANWAY GASKET	24.05	24.05
5.00	1UNISTRTCLMP	1" UNISTRUT CLAMP	2.50	12.50
100.00	REBR	REBAR	10.00	1,000.00
12.00	1/4X3X3ANG	1/4" X 3" X 3" ANGLE	3.83	45.96
10.00	1/4X4FLT	1/4" X 4" FLAT	2.68	26.80
100.00	1/8X6FLT	1/8" X 6" FLAT	2.40	240.00
7.00	12JRCHNL	12" JR. CHANNEL	11.16	78.12
80.00	1/4X2X2ANG	1/4" X 2" X 2" ANGLE IRON	2.47	197.60
4.00	2TNKFLNG	2" TANK FLANGE	10.00	40.00
35.00	10JRCHNL	10" JR CHANNEL	10.01	350.35
80.00	11/4SQTB	1 1/4" SQUARE TUBING	1.64	131.20
16.00	1/8X1X3BARGRTOP	1/8" X 1" X 3' OPEN BAR GRATE FT.	21.28	340.48

Subtotal	Continued
Sales Tax	Continued
Total Invoice Amount	Continued
Payment/Credit Applied	
TOTAL	**Continued**

Check/Credit Memo No:

ERTIFIED REPAIR SERVICE, LLC

30567 MARIGOLD RD.
SEDALIA, MO 65301
USA

Voice: 660-826-4811
Fax: 660-826-2843

INVOICE

Invoice Number: 14260
Invoice Date: Sep 28, 2011
Page: 2
Duplicate

Bill To:	Ship to:
MFA OIL COMPANY 2412 PARIS RD. P.O. BOX 519 COLUMBIA, MO 65201 USA	MFA OIL COMPANY 128 NW HWY 50 WARRENSBURG, MO 64093 USA

Customer ID	Customer PO	Payment Terms	
MFA	JOHN FRIEDRICH	DUE UPON RECIEPT	
Sales Rep ID	**Shipping Method**	**Ship Date**	**Due Date**
		9/6/11	9/28/11

Quantity	Item	Description	Unit Price	Amount
24.00	3/4X2BLT	3/4" X 2" BOLT	1.45	34.80
24.00	3/4NT	3/4" NUT	0.87	20.88
96.00	1/2NT	1/2" NUT	0.50	48.00
96.00	1/2X11/2BOLT	1/2" X 1 1/2" BOLT	0.65	62.40
50.00	2SCHD80PIP	2" SCHEDULE 80 PIPE (USED)	5.36	268.00
1.00	CONCRETE PAD	CONCRETE PAD 16' X 36'	4,800.00	4,800.00
1.00	CONCRETE PAD	6 X 18 RACK PAD	350.00	350.00
1.00	CONCRETE PAD	7' X 20' APRON	700.00	700.00
1.00	CONCRETE PAD	4' X 36' APRON	700.00	700.00
1.00	LNR	LINER	3,965.00	3,965.00
1.00	LNRKT	LINER KIT	250.00	250.00
2.00	DRNKT	DRAIN KIT	45.00	90.00
1.00	FRGHT	FREIGHT (ON LINER)	290.00	290.00
7.50	15BMTRK	15 TON BOOM TRUCK	130.00	975.00
34.50	BOBCT	BOB CAT	85.00	2,932.50
23.50	30TNCRN	30 TON CRANE	140.00	3,290.00
2.00	OWPI	PERMIT (OVERWEIGHT PERMIT)	75.00	150.00
70.00	HAULMLG	TRUCK & TRAILER FOR HAULING (HAULING OF TEMP TANKS)	2.25	157.50
66.00	GNRLLAB	LABOR TO MAKE & INSTALL TANK RINGS, MARLOW TABLE, MAKE &	55.00	3,630.00

Subtotal	Continued
Sales Tax	Continued
Total Invoice Amount	Continued
Payment/Credit Applied	
TOTAL	**Continued**

Check/Credit Memo No:

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SEDALIA, MO 65301
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Voice: 660-826-4811
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MFA	JOHN FRIEDRICH	DUE UPON RECIEPT	
Sales Rep ID	**Shipping Method**	**Ship Date**	**Due Date**
		9/6/11	9/28/11

Quantity	Item	Description	Unit Price	Amount
		INSTALL STAIRS, MAKE PLATFORM OFF OF RACK, RAISE RACK & PUMP FUEL		
1.00	MISC.	ROCK & CONCRETE	2,280.00	2,280.00
1,650.00	MLG	MILEAGE	1.75	2,887.50

Warrensburg BP

Labor to Clean & Inspect tanks, One new tank bottom, Install tank Containment liner & Catch basin, Crane.

OK to Pay (JF)

Subtotal	40,105.04
Sales Tax	558.55
Total Invoice Amount	40,663.59
Payment/Credit Applied	
TOTAL	**40,663.59**

Check/Credit Memo No:

Search Site Documents

View Site Edit: Delete:

Name:	Warrensburg BP-PC-LP (10044)	**Latitude:**	38.7751
Address:	128 North West 50 Highway	**Longitude:**	-93.7685
		Division:	
City:	Warrensburg	**EPA ID:**	
County:	Johnson	**State ID:**	
State:	Missouri		
ZIP:	64093		
Site Contact 1:	*None*	**Title:**	
Site Contact 2:	*None*	**Title:**	
Site Contact 3:	*None*	**Title:**	

Site Notes Add:

Events | Tank Systems | Documents | Forms

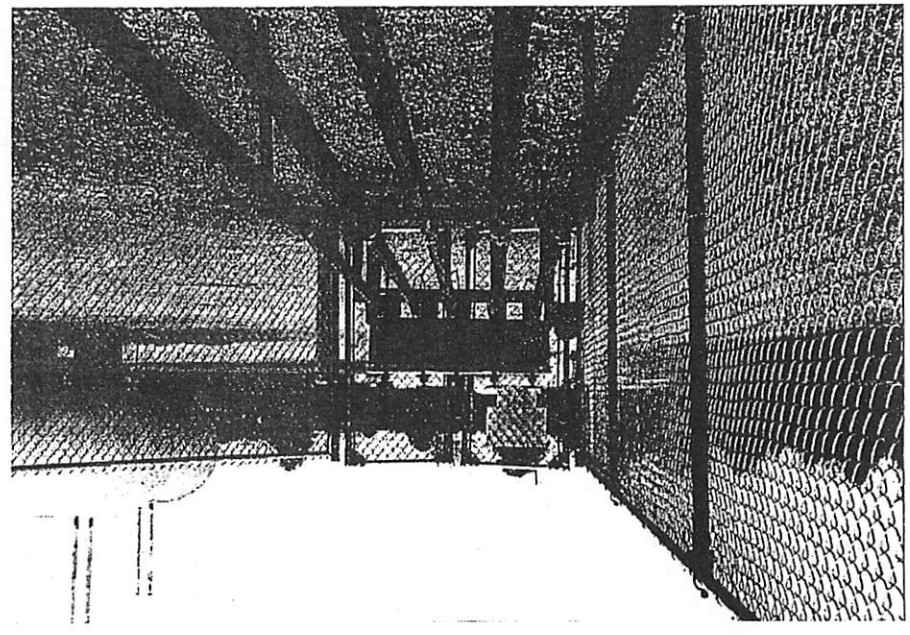
AST System Edit: Delete: **UST System** Add New:

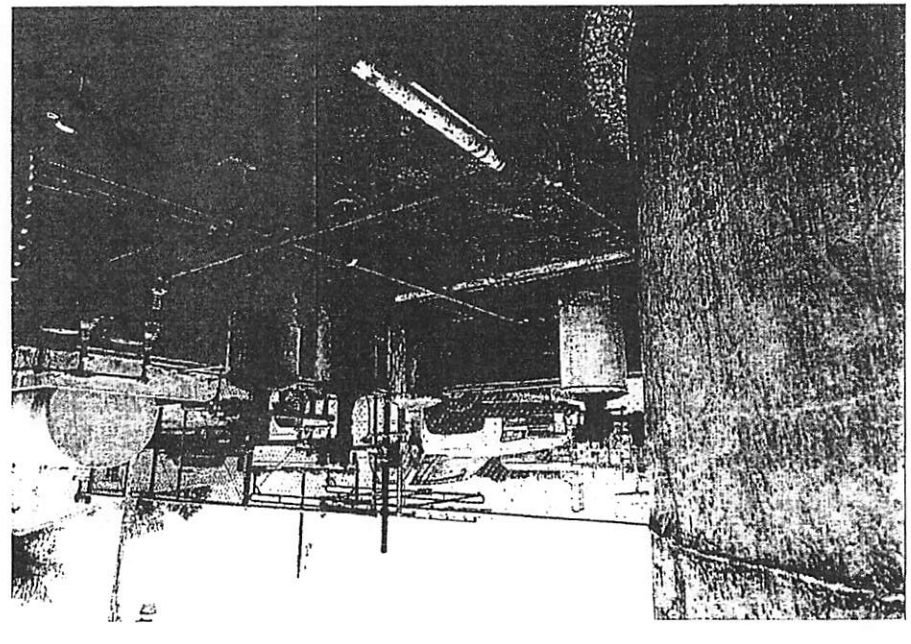
Tanks Add New:

4: 12000 gal. Regular Unleaded	
5: 12000 gal. Super Unleaded	
7: 15000 gal. #2 Dyed Low Sulfur Diesel	
8: 15000 gal. #2 Dyed Low Sulfur Diesel	
9: 1000 gal. Diesel	
10: 1000 gal. Diesel	
6: 15000 gal. #2 Low Sulfur Clear Diesel	
607275: 18,000 gal. Propane	
76096: 18,000 gal. Propane	

System Repairs Add New:

System Tests Add New:





2012

JANUARY

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FEBRUARY

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JULY

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AUGUST

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SEPTEMBER

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OCTOBER

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NOVEMBER

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DECEMBER

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30	31					

11-29-11
Per James Greer

During warrensburg SPCC upgrades they needed a new 15000 gal tank. They ordered it from Mid-South but couldn't wait the month it would take to get it in. Floyd O. talked to Clayton Uthe and Henry Steeves to work out this deal.

15000 gal tank ~~A#~~ ~~1966~~ 1 was sitting at Clever BP waiting to be used at another site. Purdy BP needed a 15000 gal tank too and could wait the month to get from Mid South.

Therefore, the deal was made that Purdy would wait for new tank. Warrensburg took the 15000 gal tank from Clever BP and Purdy BP paid for the new tank bottom. Warrensburg paid for new tank and it will be set at Purdy BP.

Per James Greer and Sandy assets will be set up as follows:
New 15000 gal as an asset of Warrensburg
15000 gal tank from Clever BP will be moved to Purdy and tank bottom added to that asset.

Technically through the assets are physically at the opposite locations

CLEAN FUEL TECHNOLOGY™
MFA OIL COMPANY
www.mfaoil.com

Julie C.

Attachment 7

Notice of Inspection Form and Confidentiality Notice Form

NOTICE OF SPCC INSPECTION

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7

Date: 5/10/2016	Lead Inspector (Print Name & Sign): Paul Doherty	Inspection Number:
Additional Inspectors: Mindy Luetke		

Facility Name:	Facility Address:	Facility Type:
MFA Warrensburg Bulk and PC facility MFA Higginsville Bulk and PC facility	126 NW 50 Highway, Warrensburg, MO 1200 W 29th St., Higginsville, MO	Wholesale and retail petroleum products dealer
Facility Phone: 660-747-8895 660- 674-2614	Facility Email:	Facility Fax:

The purpose of the inspection process is to determine compliance with Section 311 of the Clean Water Act (the "Act"), 33 U S C § 1321, and the Oil Pollution Prevention regulations found at 40 C F R Part 112 (the "Regulations") The scope of the inspection and plan review process may include, but is not limited to, reviewing and obtaining copies of documents and records, interviewing facility personnel, a physical inspection of the facility (including process areas), taking photographs or video, collecting samples, and other activities necessary to determine compliance with the Act and the Regulations

Please review this Notice of SPCC Inspection ("Notice") carefully Please be advised that this Notice and any attached document(s) may not set forth all deficiencies with the Act and/or Regulations, and that an in-depth review of this Notice and any other relevant information may identify deficiencies not yet identified herein Also note that the deficiencies noted are preliminary observations only, and this Notice is not a final determination of compliance or noncompliance

Please be advised that any noncompliance with the Act and/or Regulations may constitute a violation under the Act for which penalties or other relief may be sought Penalties may be assessed upon subsequent findings by a court of law or the Administrator that the facility has violated the Act and/or the Regulations The United States Environmental Protection Agency ("EPA") reserves its right to initiate an enforcement action under the Act and any other applicable law, and to seek penalties and other appropriate relief for any violation of the Act, the Regulations, or other applicable laws This Notice and other relevant information will be reviewed by appropriate EPA personnel to determine if any deficiencies identified in such review constitute violations of the Act and/or the Regulations, and whether an enforcement action is appropriate EPA will provide written correspondence describing any deficiencies identified during the subsequent inspection review process

If deficiencies with the Act and/or Regulations were identified during the inspection and communicated to you during the closing conference, you are urged to correct such deficiencies as soon as possible EPA requests you submit all information, as soon as possible, evidencing your correction of the deficiencies to

Mark Aaron
U S Environmental Protection Agency, Region 7
11201 Renner Boulevard
AWMD/STOP
Lenexa, Kansas 66219

If it is not feasible to correct the deficiencies within 2 days of the date of the inspection, immediately submit a detailed explanation and schedule indicating by when the noted deficiencies will be corrected If you believe that your facility is not required to have an SPCC Plan, or is in compliance with the SPCC regulatory requirements, you may submit an explanation, supported by documentation, as to why the facility is not subject to the SPCC provision of the Oil Pollution Prevention regulations at 40 C F R Part 112 or meets its requirements within 5 days of the date of the inspection

Confidential Business Information

For the information submitted to EPA, you may be entitled to claim it as Confidential Business Information (CBI) pursuant to the regulations set forth in 40 C F R Part 2 If EPA determines the information you have designated meets the criteria in 40 C F R § 2 208, the information will be disclosed only to the extent and by means of the procedures specified in 40 C F R Part 2 Subpart B Unless CBI is claimed, EPA may make the information available to the public without further notice to you

Acknowledgement of Inspection

Signature of Facility Representative:

Title of Facility Representative: EHS Coordinator

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CONFIDENTIALITY NOTICE

Facility Name:	MFA Warrensburg Bulk Plant and Petro Card Sta. MFA Higginsville Bulk Plant and Petro Card Sta.
Facility Address:	128 NW Highway 50, Warrensburg, MO 1200 W 29th St., Higginsville, MO
Inspector (print):	Paul Doherty
U.S. EPA, Region VII, 11201 Renner Road, Lenexa, KS 66219	Date: 5/10/2016

The United State Environmental Protection Agency (EPA) is obliged, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect confidentiality of the information, and it intends to continue to take such measures.

2. No statute specifically requires disclosure of the information.

3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and DO NOT want to make a claim of confidentiality at this time.

Facility Representative Provided Notice:

Daniel Creed — Print Name

Signature

5/10/16 — Date

Attachment 8

ICIS Form